

EXHIBIT G

Yvette Wang, 30(b)(6)
January 31, 2019

1

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----X
EASTERN PROFIT CORPORATION LIMITED,

4 Plaintiff-Counterclaim Defendant,

5 - against -

6 STRATEGIC VISION US, LLC,

7 Defendant-Counterclaim Plaintiff,

8 - against -

9 GUO WENGUI a/k/a MILES KWOK,

10 Counterclaim Defendant.

11 -----X
12 340 Madison Avenue
New York, New York

13 January 31, 2019
14 9:40 a.m.

15
16
17 EXAMINATION BEFORE TRIAL of YVETTE

18 WANG, a 30(b)(6) Witness on behalf of EASTERN

19 PROFIT CORPORATION LIMITED, the

20 Plaintiff-Counterclaim Defendant herein, taken

21 by the Defendant-Counterclaim Plaintiff,

22 pursuant to Court Order, held at the

23 above-mentioned time and place, before Michelle

24 Lemberger, a Notary Public of the State of New

25 York.

January 31, 2019

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APPEARANCES:

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HODGSON RUSS, LLP
Attorneys for Counterclaim Defendant
605 Third Avenue, Suite 2300
New York, New York 10158
BY: ERIN N. TESKE, ESQ.

ALSO PRESENT:

French Wallop

Sophia Xie - Mandarin interpreter
(sitting in)

* * * * *

STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by
and between the attorneys for the respective
parties herein, that filing, sealing and
certification be and the same are hereby
waived.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the form of
the question shall be reserved to the time of
the trial.

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed and
sworn to before any officer authorized to
administer an oath, with the same force and
effect as if signed and sworn to before the
Court and that a copy of this examination
shall be furnished without charge to the
attorney representing the witness testifying
herein.

1
2 Y V E T T E W A N G, having been first duly
3 sworn by a Notary Public of the State
4 of New York, was examined and
5 testified as follows:

6 BY THE REPORTER:

7 Q. Please state your name for the
8 record.

9 A. Yvette Wang.

10 Q. What is your present address?

11 A. 150 East 57th Street, Apartment 22D,
12 New York, New York 10022.

13 EXAMINATION BY

14 MR. SCHMIT:

15 Q. Good morning. Could you please
16 state your name for the record?

17 A. Yvette Wang.

18 Q. Ms. Wang, my name is Joe Schmit. We
19 met a moment ago. I represent defendant and
20 counterclaim plaintiff in this, Strategic
21 Vision U.S. LLC.

22 You're here this morning for your
23 deposition. Do you recognize that?

24 A. Yes.

25 Q. You're here specifically as a

1 Yvette Wang
2 30(b)(6) representative for plaintiff in this
3 action, Eastern Profit Corporation Limited;
4 is that right?

5 A. Yes.

6 Q. Has your attorney explained to you
7 what that means, being a 30(b)(6)
8 representative?

9 A. Yes.

10 Q. I'm going to ask you a series of
11 questions. All I ask is that you give me
12 complete and truthful answers; is that all
13 right?

14 A. Will do.

15 Q. The most important thing in my book
16 is that you understand the question.

17 A. Yes.

18 Q. If at any time you don't understand
19 the question I am asking, just let me know,
20 okay?

21 A. Yes.

22 Q. I will do my best to meet your
23 concern. Okay?

24 A. Yes, thank you.

25 Q. There's one thing. There was a

1 Yvette Wang
2 little bit of a miscommunication. We do have
3 a Mandarin interpreter in the room, but my
4 understanding is you don't need an
5 interpreter?

6 A. Thank you.

7 Q. Is that correct?

8 A. I will try my best, it's correct.

9 Q. Okay. If during the morning there
10 comes a time, because for whatever set of
11 reasons you want to change your mind, just
12 let me know. Okay?

13 A. Sure, thank you.

14 MR. GRENDI: Just before we get
15 into it, I just want to put an
16 objection on the record. I think
17 just for clarity and consistency down
18 the road because I don't want to be
19 interrupting you all the time, but to
20 the extent that you're asking
21 questions that are part of the topics
22 encompassed in the 30(b)(6)
23 attachment, obviously the witness
24 will be answering for the
25 corporation. To the extent there are

1 Yvette Wang
2 questions being asked outside of
3 that, the witness will not be
4 answering for the corporation, will
5 be answering based on her own
6 knowledge. And I may pop in with
7 that every now and then.

8 BY MR. SCHMIT:

9 Q. Ms. Wang, I'm going to ask you from
10 time to time how you know the answer and just
11 let me know if you've been educated and
12 provided the answer or if it is from your
13 personal knowledge; is that okay?

14 A. Okay.

15 MR. SCHMIT: Let's have this
16 marked as Exhibit 1. If at any time
17 you need a break, just let us know,
18 okay.

19 THE WITNESS: Sure, thank you.

20 (Whereupon, at this time, the
21 reporter marked the above-mentioned
22 notice of deposition as Wang Exhibit
23 1 for identification.)

24 BY MR. SCHMIT:

25 Q. Ms. Wang, I'm going to hand you

1 Yvette Wang

2 what's been marked for your deposition as

3 Exhibit 1.

4 A. Thank you.

5 Q. It is Strategic Vision's notice of

6 30(b)(6) deposition to plaintiff.

7 Do you have that in front of you?

8 A. Yes.

9 Q. Have you seen it before?

10 A. Yes, I did.

11 Q. If you can turn to the last page,
12 those are the list of topics that have been
13 identified.

14 Do you see that?

15 A. Yes.

16 Q. Have you reviewed those topics
17 before?

18 A. Yes.

19 Q. Are there any topics there that
20 you're not prepared to testify concerning
21 today?

22 A. No. All of them, I'm ready to
23 answer the question.

24 Q. Eastern Profit Corporation Limited,
25 are you familiar with that entity?

1 Yvette Wang

2 A. Not too much.

3 Q. To what extent are you familiar with
4 that entity?

5 A. No.

6 Q. You said not too much?

7 A. Yes.

8 Q. How are you, if at all, affiliated
9 with Eastern Profit Corporation Limited?

10 A. I was told this is another party,
11 but I don't know this company at all before
12 this project.

13 Q. You referred to you were told this
14 is another party. What do you mean by that?

15 A. Miles, that is the person who
16 involved in this project as well, and he told
17 me this is another party of the contract.

18 Q. Miles, who are you referring to?

19 A. Miles Kwok.

20 Q. Is he known by any other names?

21 A. Kwok Ho Wan, I think.

22 Q. Could you spell that?

23 A. K-W-O-K, H-O, W-A-N.

24 Q. How about Guo?

25 A. Yes.

1 Yvette Wang

2 Q. How do you spell that?

3 A. G-U-O.

4 Q. And is that his first name often?

5 A. Last name, family name.

6 Q. So sometimes people refer to him as

7 Mr. Guo?

8 A. Yes.

9 Q. If I say Mr. Guo, you'll know who

10 I'm referring to?

11 A. Yes.

12 Q. If I say Eastern Profit, will you

13 know that I'm referring to Eastern Profit

14 Corporation Limited?

15 A. Yes.

16 Q. So is it Mr. Guo who introduced you

17 to Eastern Profit?

18 A. Yes.

19 Q. When did that happen?

20 A. In December 2017. No, the contract

21 was signed 2018, right before this contract

22 was signed.

23 Q. I'll represent to you the contract

24 was signed on January 6, 2018; does that

25 sound about right?

1 Yvette Wang

2 A. 2018. That's right, December 2017.

3 Q. So shortly before January you would
4 have been introduced to Eastern Profit?

5 A. Yes.

6 Q. What did Mr. Guo tell you about
7 Eastern Profit when he introduced you to that
8 company?

9 A. He told me this is another party of
10 this contract, and then he gave me the name.
11 And that's it.

12 Q. When you say "another party of the
13 contract," what are you referring to?

14 A. Another party. The client of this
15 contract.

16 MR. SCHMIT: Just so the record
17 is clear, could I have this marked as
18 Exhibit 2?

19 (Whereupon, at this time, the
20 reporter marked the above-mentioned
21 research agreement as Wang Exhibit 2
22 for identification.)

23 BY MR. SCHMIT:

24 Q. I'm going to hand you what's been
25 marked as Exhibit 2.

1 Yvette Wang

2 Do you recognize that document?

3 A. Yes.

4 Q. What is it?

5 A. It's the contract signed between

6 Eastern Profit and Strategic Vision.

7 Q. And in your answers up until now,
8 you've been saying the other party to the
9 contract. You're referring to the contract
10 that I just marked as Exhibit 2?

11 A. Correct.

12 MR. GRENDI: Objection to the
13 form.

14 You can answer.

15 Q. When Mr. Guo introduced you to
16 Eastern Profit, did he hand you the contract?

17 A. I don't understand what you mean,
18 hand me the contract?

19 Q. How did he say -- what did he say
20 when you first heard the words Eastern Profit
21 or first heard of the entity?

22 A. I remember that happened before I
23 went to Virginia to discuss about this
24 contract. By then I was request to negotiate
25 this contract. Then I ask who is the client.

1 Yvette Wang

2 Then I had that, this name.

3 Q. So you were negotiating the contract
4 on behalf of Mr. Guo initially?

5 MR. GRENDI: Objection of the
6 form.

7 You can answer.

8 A. I will listen to my lawyer.

9 MR. GRENDI: I said you can
10 answer.

11 Q. No, no, you can answer. Unless he
12 tells you not to answer, you have to answer.

13 Objections are just for the record.

14 A. Okay. Correct.

15 Q. And then at some point Mr. Guo said,
16 The actual entity that's going to enter the
17 contract is Eastern Profit, right?

18 A. Correct.

19 Q. So initially, when you were
20 negotiating in Virginia, you were speaking on
21 behalf of Mr. Guo; is that a fair statement?

22 MR. GRENDI: Objection, you can
23 answer.

24 MS. TESKE: Objection.

25 A. Correct.

1 Yvette Wang

2 Q. And then at some point prior to
3 execution, he said the party we're going to
4 put in the contract is Eastern Profit, right?

5 MR. GRENDI: Objection.

6 You can answer.

7 A. I don't remember that.

8 Q. So what did he finally tell you when
9 he introduced you to Eastern Profit?

10 A. Because I am a project manager. I
11 have to have enough information for a
12 project. So I request the necessary
13 information to finish this contract. Then he
14 gave me this name.

15 Q. What information did you request of
16 Mr. Guo in order to finish this project?

17 A. At least who is the client or who is
18 the vendor.

19 Q. So when you asked him who the client
20 or the vendor was, he said Eastern Profit; is
21 that fair?

22 A. Correct.

23 Q. What did he tell you about Eastern
24 Profit at that time?

25 A. I don't remember.

1 Yvette Wang

2 Q. Did you ask anything?

3 A. No.

4 Q. Up until that point, had you ever

5 heard of Eastern Profit before?

6 A. I don't remember I heard about that.

7 Q. Sitting here today, you think that

8 may have been the first time you ever heard

9 of Eastern Profit?

10 A. You mean by then?

11 MR. GRENDI: Objection to the

12 form.

13 You can answer, go ahead.

14 A. You mean by this time, December

15 2017?

16 Q. Yes.

17 A. Yes.

18 Q. So as far as you can recall, that's

19 the first time you ever heard of Eastern

20 Profit?

21 A. Correct.

22 Q. Did Mr. Guo tell you anything about

23 Eastern Profit?

24 A. I don't remember.

25 Q. What does Eastern Profit do?

1 Yvette Wang

2 MR. GRENDI: I'll just remind

3 everyone of the objection as to the

4 topics that the witness has been

5 prepared to testify about, and this

6 outside the topics. But you can go

7 ahead and answer.

8 MR. SCHMIT: This is well

9 within the topics, but you stated

10 your objection.

11 Q. What does Eastern Profit do?

12 A. I do not know.

13 Q. Does Eastern Profit have a board of
14 directors?

15 A. I don't know.

16 Q. Are you employed by Eastern Profit?

17 A. No, I'm not.

18 Q. Are you an officer or director of
19 Eastern Profit?

20 A. I am not.

21 Q. Have you ever met anybody or spoken
22 on the phone with anybody who is employed by
23 Eastern Profit?

24 A. No, I didn't.

25 Q. Have you ever met anybody or spoken

1 Yvette Wang
2 on the phone with anybody that you understood
3 to be an officer or director of Eastern
4 Profit?

5 A. No, I didn't.

6 Q. Since you executed the contract on
7 behalf of Eastern Profit, has anybody told
8 you anything about what Eastern Profit does?

9 A. You mean business?

10 Q. Anything. However you want to
11 characterize it.

12 A. If I recall a little bit, I'm not
13 sure, Mr. Guo said Eastern Profit is a kind
14 of, like, investment company. But I didn't
15 ask further what is that.

16 Q. Do you know where Eastern Profit is
17 based?

18 A. Hong Kong.

19 Q. Does it have an office there?

20 A. I don't know.

21 Q. Again, do you know if there are any
22 employees in Hong Kong?

23 A. Eastern Profit employee?

24 Q. Yes.

25 A. No, I didn't.

1 Yvette Wang

2 Q. You don't know whether there are or
3 aren't?

4 A. What is your question, I don't
5 understand?

6 Q. In Hong Kong, are there any, just to
7 be clear, are there any employees of Eastern
8 Profit in Hong Kong?

9 A. I didn't request, I didn't research.

10 Q. When he said it was an investment
11 company, did you ask what type of
12 investments?

13 A. No, I didn't.

14 Q. Who are you employed by, Ms. Wang?

15 A. Golden Spring New York Limited.

16 Q. What is that company?

17 A. Family office.

18 Q. Family office for who?

19 A. For clients.

20 Q. I just want to make sure, what's
21 your definition of a family office?

22 A. Family office, my definition?

23 Q. Yes.

24 A. Work for projects come from family
25 and the family's partner, friends,

1 Yvette Wang

2 associates.

3 Q. When you say "family," who are you
4 referring to?

5 MR. GRENDI: Objection. Again,
6 I just want to restate my earlier
7 general objection.

8 You can answer.

9 MR. SCHMIT: What's your
10 earlier general objection?

11 MR. GRENDI: Outside the scope
12 of the list of items in the
13 attachment to 30(b)(6).

14 MR. SCHMIT: Golden Spring,
15 just so it is clear, verified the
16 interrogatories in this case.

17 MR. GRENDI: I understand that.

18 Q. You can answer.

19 MR. GRENDI: You can answer.

20 Q. Whose family?

21 A. A family come from Mainland of China
22 and Hong Kong.

23 Q. And what is the name of the family?

24 A. I cannot disclosure that.

25 Q. Is it Mr. Guo's family?

1 Yvette Wang

2 A. I cannot disclosure that.

3 Q. Does Mr. Guo review directions at
4 Golden Spring?

5 A. Sorry?

6 Q. Does Mr. Guo tell you what to do
7 when you're working on behalf of Golden
8 Spring?

9 A. No.

10 Q. Who does?

11 A. China Golden Spring Group, Hong Kong
12 Limited.

13 Q. Where are they located?

14 A. Hong Kong.

15 Q. Who speaks on behalf of that entity?

16 MR. GRENDI: Objection, again.

17 We're really getting far afield of
18 what this deposition is supposed to
19 be about.

20 MR. SCHMIT: You know, I don't
21 think we're getting far afield at
22 all. But to be perfectly honest, we
23 have a 30(b)(6) witness brought in on
24 behalf of the plaintiff in this case
25 that apparently doesn't know anything

1 Yvette Wang
2 about the plaintiff. And this
3 company that I'm asking about now,
4 verified as attorney in fact the
5 interrogatories on behalf of the
6 plaintiff.

7 MR. GRENDI: Right. They're
8 obviously the attorney in fact
9 relationship is disclosed. So that's
10 clear. If you want to have a
11 discussion, I think, off the record,
12 maybe we can discuss the problems
13 that you're having here. But I
14 really want to get this deposition on
15 track as to what this contract was
16 about and how it was negotiated.

17 MR. SCHMIT: We're getting
18 there, we're getting there. We are.
19 I just want to make sure we
20 understand who all the entities are.

21 BY MR. SCHMIT:

22 Q. Are there other employees for Golden
23 Springs New York LTD in New York?

24 A. Sorry, what is your question?

25 Q. You work for this entity, Golden

1 Yvette Wang

2 Springs, correct?

3 A. Yes.

4 Q. Are there other employees?

5 MR. GRENDI: Objection. You

6 can answer.

7 A. In New York?

8 Q. In New York.

9 A. I don't answer this. But because,
10 you know, I try to save everyone's time, so,
11 yes, they do have employees here.

12 Q. Where is it? Is there an office?

13 A. Yes.

14 Q. Where is the office located?

15 A. 800 Fifth Avenue.

16 Q. How many employees are there for
17 this entity?

18 A. 12 now, I think, 12.

19 Q. Does Mr. Guo work for this entity?

20 A. No.

21 Q. Why did Golden Springs verify the
22 interrogatories in this case?

23 MR. GRENDI: Objection.

24 You can answer.

25 A. I don't understand your question.

1 Yvette Wang

2 Q. Why did --

3 MR. SCHMIT: Let's have this
4 marked as Exhibit 3.

5 (Whereupon, at this time, the
6 reporter marked the above-mentioned
7 responses and objections to
8 interrogatories as Wang Exhibit 3 for
9 identification.)

10 BY MR. SCHMIT:

11 Q. I'm handing you what's been marked
12 for your deposition as Exhibit 3.

13 A. Thank you.

14 Q. Do you recognize that document?

15 A. Yes.

16 Q. Turn to the second to last page. Do
17 you see that, the verification?

18 A. Yes.

19 Q. Is that your signature there?

20 A. Yes.

21 Q. And it says, Yvette Wang, President,
22 do you see that?

23 A. Yes.

24 Q. And then up above it says Golden
25 Spring New York LTD. I assume your title is

1 Yvette Wang
2 president with Golden Spring LTD, right?

3 A. You're right.

4 Q. Why did you verify the
5 interrogatories in this fashion?

6 MR. GRENDI: I'm just going to
7 object to the form, and -- well,
8 if -- go ahead and answer if you can.

9 A. Because I was project manager of
10 this contract (indicating).

11 Q. And does Golden Spring LTD have any
12 contractual relationships with Eastern
13 Profit?

14 A. No.

15 MR. GRENDI: Objection. I
16 mean, I think that needs to be
17 clarified and I think there's a
18 document that will clarify that.

19 Can we go off the record
20 briefly?

21 MR. SCHMIT: Yes, sure, why
22 not?

23 MR. GRENDI: Do you want to
24 step outside?

25 MR. SCHMIT: You want to talk

1 Yvette Wang

2 with me?

3 MR. GRENDI: With you, yes.

4 (Whereupon, a brief recess was
5 taken.)

6 MR. GRENDI: Just in the
7 interest of clarifying the record, as
8 I think there is just an error there,
9 there is a relationship between
10 Golden Spring and Eastern Profit
11 Corporation, there's a limited power
12 of attorney. That document, we're
13 happy to produce that to clarify this
14 issue. But I think the answer that
15 there's no relationship between
16 Eastern Profit and Golden Spring was,
17 obviously, just kind of a mistake
18 made by a witness that's not an
19 attorney.

20 So we will produce that
21 document shortly. I don't have it on
22 me.

23 BY MR. SCHMIT:

24 Q. Ms. Wang, have you seen this power
25 of attorney document?

1 Yvette Wang

2 A. Yes.

3 Q. Do you recall who signed it on
4 behalf of Eastern Profit?

5 A. I don't remember that. It's a long
6 time ago. If you have it -- I don't
7 remember.

8 MR. GRENDI: I believe the
9 document will clarify that.

10 MR. SCHMIT: Can you help, for
11 the record, and say who executed it?

12 MR. GRENDI: I know him as
13 Hank. His full name is -- it's in
14 the interrogatory responses. Let me
15 see, I want to make sure I get it
16 right for the record. C-H-U-N-G,
17 U-A-N-G, H-A-N. That's my
18 recollection.

19 BY MR. SCHMIT:

20 Q. If you can turn to Exhibit 3, second
21 page, do you see the second interrogatory,
22 number 2?

23 A. Yes.

24 Q. It says identify the principals of
25 Eastern.

1 Yvette Wang

2 Do you see that?

3 A. Yes.

4 Q. And then that's Mr. Han, your
5 attorney just spelled into the record, right?

6 MR. GRENDI: Objection, but,
7 yes, go ahead.

8 A. Yes.

9 Q. Is that the only principal of
10 Eastern that you're aware of?

11 A. From here, yes.

12 Q. Are you aware of any other
13 principals of Eastern Profit?

14 A. No.

15 Q. Have you ever met Mr. Han?

16 A. We met before.

17 Q. Where does he reside?

18 A. Sorry?

19 Q. Where does he live? Where does he
20 reside?

21 A. I don't know.

22 Q. Where did you meet him?

23 A. New York.

24 Q. Do you know if he resides in the
25 States, the United States?

1 Yvette Wang

2 A. I didn't ask.

3 Q. Did he explain to you what his
4 relationship with Eastern Profit was?

5 A. He didn't explain.

6 Q. Do you have any idea why he would
7 execute a power of attorney for Eastern
8 Profit?

9 A. Because we provide service, Golden
10 Spring.

11 Q. Service to who?

12 A. Service to the client.

13 Q. Who is the client?

14 A. Eastern Profit.

15 Q. Does Eastern Profit provide Golden
16 Spring with any compensation?

17 A. Not now, not yet.

18 Q. When you say "not now," will they at
19 some time in the future or have they at some
20 time in the past?

21 MR. GRENDI: Objection of form.

22 You can answer.

23 A. No.

24 Q. And what did you mean by not now?

25 MR. GRENDI: Objection.

1 Yvette Wang

2 You can answer.

3 Q. You can answer.

4 A. Oh.

5 MR. GRENDI: You can answer,

6 I'm sorry.

7 Q. Yes. He's just making an objection

8 for the record. It's for him and I to work

9 out later, if necessary.

10 A. Okay. Because Golden Spring didn't

11 sign any contract with Eastern. So I don't

12 know there is any payment or any, like,

13 payment, yeah.

14 Q. Does Eastern Profit have a bank

15 account anywhere?

16 A. I don't know.

17 Q. Why did Eastern Profit enter into

18 this contract?

19 A. I don't know.

20 Q. But Mr. Guo told you Eastern Profit

21 was going to be the client that should be put

22 in the contract, right?

23 A. Correct. Mr. Guo said he is the

24 advisor and consultant to Eastern. So that's

25 why he communicated and told me Eastern

1 Yvette Wang

2 should be in this contract.

3 Q. Did he say what he was advising or
4 consulting Eastern Profit on?

5 A. He didn't say that clearly, but I
6 remember he mentioned about, like, strategy
7 or some investments, something like that.

8 Q. Tell me, when did he give this
9 explanation?

10 A. I don't remember that clearly.
11 Should be in December or January, right
12 before or after this contract signed.

13 Q. What was the purpose of the
14 contract?

15 A. Investigation service.

16 Q. Investigation of what?

17 A. Information.

18 Q. What kind of information?

19 A. Let me review the contract again.

20 (Witness peruses document.)

21 Q. You can't answer that question
22 without looking at the contract?

23 A. I can.

24 Q. I mean, you're welcome to look at
25 it, but what was being investigated pursuant

1 Yvette Wang

2 to the contract?

3 A. Financial, forensic, historical
4 research, current tracking research, social
5 media research.

6 Q. Of what?

7 A. Of what? I don't understand your
8 question.

9 Q. I mean, those are general areas, but
10 what's being researched? Buildings, people,
11 plants, animals? What's being researched?

12 A. People.

13 Q. How were the people identified that
14 were going to be researched?

15 MR. GRENDI: Objection. I just
16 want to hop in here. We may be,
17 obviously, designating portions of
18 this deposition confidential. I just
19 want to put that on the record,
20 something I should have said at the
21 outset, and obviously applies
22 retroactively to the beginning.

23 Go ahead and answer.

24 A. The people they are Strategic Vision
25 called them fish, F-I-S-H.

1 Yvette Wang

2 Q. You use that term as well, correct?

3 A. Yes. That is Strategic Vision

4 request me to use.

5 Q. What did you understand fish to

6 mean?

7 A. Target people, human beings.

8 Q. But Strategic Vision wasn't

9 identifying anybody to be researched, that

10 was Eastern Profit, right?

11 A. Correct.

12 Q. So who was Eastern Profit

13 identifying to be researched and why?

14 A. Some individual who are highly

15 corrupted, Chinese people.

16 Q. Corrupted in whose view?

17 MR. GRENDI: Objection.

18 You can answer.

19 A. I don't understand your question.

20 Q. What do you mean by corrupted?

21 A. Corrupted, they are Chinese high

22 level official, or some of them they are high

23 level and some of them are official,

24 government official, and their family. They

25 are suspected to have huge illegal criminal

1 Yvette Wang

2 assets in other country, which they steal
3 from Chinese government and Chinese people.

4 Q. And when you say "other country,"
5 what are you referring to?

6 A. Other country means outside of the
7 Mainland of China.

8 Q. And these people, were they -- are
9 they members of the Communist party?

10 A. Some of them, they are.

11 Q. And who identified these people?

12 MR. GRENDI: Objection.

13 You can answer.

14 A. Mr. Guo.

15 Q. And from where did Mr. Guo get his
16 information?

17 A. I don't know.

18 Q. You never asked?

19 A. No.

20 Q. Did he ever say why certain
21 individuals were being identified?

22 A. I didn't ask. But if you want, you
23 can follow his social media. He talks a lot
24 in there.

25 Q. About what he's doing and why he's

1 Yvette Wang

2 doing it?

3 A. Yes.

4 Q. What is your understanding, though,
5 of what he is doing and why he's researching
6 these people?

7 MR. GRENDI: Objection.

8 You can answer.

9 A. I don't understand. What is your
10 question?

11 Q. Well, what is your understanding?

12 A. My understanding?

13 Q. Of why he's investigating these
14 people.

15 A. Oh, okay. He needs the information
16 about these people to whistle blow and
17 disclosure their crime. So Chinese
18 government, and even other countries'
19 authorities, they can take action to this
20 corrupted criminal, Chinese official.

21 Q. So your understanding was the
22 research would be reported back to China?

23 A. I don't know that.

24 Q. How was he going to do what you just
25 said?

1 Yvette Wang

2 A. What is your question?

3 Q. How was Mr. Guo going to help report
4 or whistle blow on these individuals?

5 MR. GRENDI: Objection.

6 You can answer.

7 A. I didn't ask. And I don't know.

8 But from what he has done on his media, his
9 social media, and he probably, I mean,
10 explained to the public, I don't know, this
11 is all my guess.

12 MS. TESKE: Can I add my
13 objection to that question? Thank
14 you.

15 Q. Who besides you assisted on this
16 project for Mr. Guo?

17 MS. TESKE: Objection.

18 MR. GRENDI: Objection. You
19 can answer.

20 A. I heard there's a gentleman called
21 Mr. Han Lianchao, H-A-N, L-I-A-N-C-H-A-O.

22 Q. Did you work with anybody else on
23 this project other than Mr. Guo?

24 MR. GRENDI: Objection. You
25 can answer.

1 Yvette Wang

2 A. No.

3 Q. Was anybody else from Golden Springs
4 involved in this project?

5 MR. GRENDI: Objection. You
6 can answer.

7 A. No.

8 Q. How did Eastern Profit identify
9 these individuals?

10 A. I don't know.

11 Q. You never asked?

12 A. No.

13 Q. Mr. Guo never said, This is where we
14 got this list of corrupt people?

15 A. No.

16 Q. Is Mr. Guo a member of the Communist
17 Party?

18 A. No.

19 MR. GRENDI: Objection. You
20 can answer.

21 MS. TESKE: Objection.

22 A. No. I'm allowed to answer that.

23 Q. Are you a member of the Communist
24 Party?

25 A. I was before.

1 Yvette Wang

2 Q. When did your affiliation with the
3 Communist Party end?

4 MR. GRENDI: Objection. You
5 can answer.

6 A. Five years ago, about. Five or six,
7 yes.

8 Q. Do you know why Mr. Guo cares if
9 these individuals are committing crimes
10 against the Chinese government?

11 MR. GRENDI: Objection. You
12 can answer.

13 A. It's a big question, but I love to
14 answer. And if you follow all the media,
15 including New York Times, Washington Post,
16 Wall Street Journal, all of this, big media
17 internationally, and his own social media,
18 you will have the answer.

19 Q. How about you provide me with your
20 answer?

21 A. Because he spoke out on behalf of a
22 Chinese outrage, common people, about the
23 corruption of Chinese certain high official.
24 There's no rule of law and democracy in
25 Mainland of China. And Chinese outrage

1 Yvette Wang

2 people, they deserve, and they urgently,
3 hungrily need that.

4 So he believed what he has been
5 doing until now, since two years ago, is for
6 justice and for rule of law, democracy of
7 China.

8 Q. You keep saying certain high
9 official. Is there a particular individual
10 you're referring to?

11 MR. GRENDI: Objection. I just
12 want to again --

13 A. I would love to answer.

14 Q. You could answer.

15 MR. GRENDI: I wasn't going to
16 say that you can't. Do we want to
17 put the names of individuals that are
18 going to be potentially more targets
19 of this research contract on the
20 record?

21 MR. SCHMIT: Well, I just want
22 to make sure.

23 Q. You're saying one high official, you
24 keep saying, in your answer. Are you
25 referring -- how about a yes or no? Are you

1 Yvette Wang

2 referring to a particular individual?

3 MR. GRENDI: Objection to the

4 form.

5 You can answer.

6 A. From New York Times and Washington

7 Post, Wall Street Journal reported about Mr.

8 Guo, I know he whistle blow a lot about

9 Chinese vice president, somehow, yes. If you

10 read article, you can have answer.

11 Q. But is that who you were referring

12 to?

13 A. I don't understand your question.

14 Q. In your answer, you keep saying

15 singular, high official.

16 A. Singular?

17 Q. I just want to make sure.

18 A. Maybe my English too broken. I

19 didn't say singular. What do you mean

20 singular?

21 Q. As in one person as opposed to many,

22 as opposed to plural?

23 A. Many, many, yes.

24 Q. So when you say "high official,"

25 you're referring to the people being

1 Yvette Wang

2 identified to be investigated, right?

3 A. Yes.

4 MR. GRENDI: Objection. You

5 can answer.

6 Q. The entity ACA Capital Group

7 Limited, are you familiar with that?

8 A. I heard this name.

9 Q. How did you hear this name?

10 A. From this project.

11 Q. In what context did the name come

12 up?

13 A. I don't have that.

14 Q. Well, how did you hear about it in

15 connection with this project?

16 A. After that one million was wired to

17 Strategic Vision without contract signed, I

18 heard ACA trying to fix this mistake. And

19 then this name came to me.

20 Q. Prior to them wiring a million

21 dollars to Strategic Vision, you had never

22 heard of ACA Capital?

23 A. No, I didn't.

24 Q. Do you know why they wired a million

25 dollars to Strategic Vision?

1 Yvette Wang

2 A. I don't know, but with this contract
3 that's supposed to be the deposit to this
4 contract.

5 Q. But why did ACA Capital Limited send
6 the money?

7 MR. GRENDI: Objection, you can
8 answer.

9 Q. As opposed to, say, Eastern Profit?

10 MR. GRENDI: Objection. You
11 can answer.

12 MR. SCHMIT: What is the
13 objection on that one? I'm being
14 pretty liberal about not getting into
15 this debate, but there have been a
16 lot of objections that are
17 questionable, to say the least.

18 MR. GRENDI: There is a lack of
19 clarity in the form.

20 MR. SCHMIT: There is? What is
21 it? I'd like to meet it.

22 MR. GRENDI: I mean, I think
23 you're indicating that -- well, you
24 know what --

25 MR. SCHMIT: I asked why?

1 Yvette Wang

2 MR. GRENDI: I mean, what, as

3 to --

4 MR. SCHMIT: It's kind of a

5 standard question.

6 MR. GRENDI: You want me to

7 explain why your question is a little

8 bit incomplete? I don't want to --

9 MR. SCHMIT: No, if there's a

10 form and I can clarify it somehow for

11 you or the witness, I'd like to do

12 so.

13 MR. GRENDI: Well, I'll allow

14 it to go forward, but I just think

15 it's not necessarily an accurate

16 reflection of what's going on here.

17 But go ahead.

18 MR. SCHMIT: Can you read the

19 question for the witness?

20 (Whereupon, at this time, the requested

21 portion was read by the reporter.)

22 A. Why? Right?

23 Q. Yes.

24 A. From my understanding, that was the

25 deposit to this research equipment. Before

1 Yvette Wang
2 the research equipment was officially signed,
3 and that was a kind of mistake, shouldn't
4 happen. Because there was even not a
5 contract at all by then.

6 Q. You mean a contract hasn't been
7 executed at all by then?

8 A. Signed, executed, correct.

9 Q. Right. Because the wire from ACA
10 Capital came a few days before January 6th,
11 right?

12 A. January 6th, correct.

13 Q. Which is the day the contract was
14 actually executed, right?

15 A. You are right.

16 Q. But I'm going to go back to my
17 question.

18 Why did ACA Capital Limited send
19 money that you're saying is pursuant to a
20 contract that ACA Capital Limited never
21 signed, ever?

22 A. So you are asking why, right?

23 Q. Why.

24 A. I heard there is a loan between
25 Eastern Profit and ACA.

1 Yvette Wang

2 Q. A loan?

3 A. Yes.

4 Q. Who told you about this loan?

5 A. Both Mr. Guo. And if I remember
6 correctly, Mr. Han.

7 Q. What is the loan?

8 A. I don't know.

9 Q. But Eastern Profit had loaned money
10 to ACA Capital?

11 A. Borrow money from ACA Capital.

12 Q. How much did they borrow?

13 A. I don't know.

14 Q. Was the idea that Eastern Profit was
15 going to have to pay this million dollars
16 back to ACA Capital?

17 A. They called this is a loan,
18 officially there should be a payback, in my
19 understanding.

20 Q. In other words, at some point ACA
21 Capital is going to want that million dollars
22 back from Eastern Profit?

23 A. You are right.

24 Q. Why did ACA Capital agree to provide
25 the funds to Eastern Profit?

1 Yvette Wang

2 A. There was a loan.

3 Q. But why did they agree to enter into
4 the loan for this contract?

5 A. I don't know.

6 Q. You don't know why they didn't?

7 A. No.

8 Q. Is there documentation to support
9 this loan?

10 A. I requested there should be some
11 documents.

12 Q. Have you ever seen the documents
13 supporting this loan?

14 A. I didn't see that.

15 Q. You did not see it?

16 A. No.

17 MR. SCHMIT: Obviously, if
18 there's any documents supporting this
19 loan, we'd ask that they be produced.

20 MR. GRENDI: Request noted.

21 Q. What is ACA Capital Limited?

22 A. I heard it's a fund management
23 company, assets management company, something
24 like that.

25 Q. Where is it located?

1 Yvette Wang

2 A. I heard it's located in Hong Kong.

3 Q. Have you ever spoken with anybody
4 from ACA Capital Limited?

5 A. No.

6 Q. Does Golden Springs do business with
7 ACA Capital Limited?

8 MR. GRENDI: Objection. You
9 can answer.

10 A. No.

11 Q. Is Mr. Guo affiliated with ACA
12 Capital Limited at all?

13 A. I don't know.

14 Q. Has there been any communications
15 with ACA Capital Limited since this lawsuit
16 began?

17 A. You mean the communication between
18 who and who?

19 Q. Eastern Profit and ACA Capital
20 Limited.

21 A. I don't know.

22 Q. Nobody has informed you of any?

23 A. No.

24 Q. You don't know if ACA Capital has
25 inquired about where the million dollars is

January 31, 2019

47

1 Yvette Wang

2 or anything along those lines?

3 A. They didn't tell me, but I heard
4 from Mr. Guo that there was a loan, and they
5 are asking the money back. But, obviously,
6 that conversation might happen in Hong Kong,
7 which I was not involved.

8 Q. But Mr. Guo informed you that they
9 are probably asking for the money back?

10 A. Correct.

11 Q. Do you know what the terms of the
12 loan were?

13 A. I don't know.

14 Q. Are they asking for the money back
15 because the term -- the contract was
16 terminated?

17 A. Obviously --

18 MR. GRENDI: Objection of form.

19 You can answer.

20 A. Obviously, correct. Because this
21 contract produced nothing.

22 Q. By the way, is that why ACA Capital
23 Limited is asking for the money back, do you
24 know that?

25 MR. GRENDI: Objection to the

1 Yvette Wang

2 form.

3 You can answer.

4 A. I don't know.

5 Q. Does Golden Springs work for any --

6 do any work for any clients unaffiliated with

7 Mr. Guo?

8 A. I don't understand your question.

9 What is your question?

10 Q. Are there any clients other than

11 companies that Mr. Guo brings to Golden

12 Springs that Golden Springs does work for?

13 MR. GRENDI: Objection. I just

14 want to clarify, which Golden Spring?

15 MR. SCHMIT: New York Golden

16 Spring, that the witness is an

17 employee of.

18 A. So you're asking Golden Spring's

19 clients?

20 Q. Yes.

21 A. I cannot disclosure that. But you

22 ask, is there any clients of Golden Spring

23 who was or were introduced by Mr. Guo?

24 Q. No, that were not. I mean, are all

25 the clients brought to your Golden Spring by

1 Yvette Wang

2 Mr. Guo?

3 A. Oh, is there any --

4 MR. GRENDI: Objection.

5 A. Is there any other client, right?

6 Brought by Mr. Guo to Golden Spring,

7 introduced, you mean, right?

8 Q. Why don't you answer that question,

9 we'll start there.

10 MR. GRENDI: Objection.

11 Q. Just a yes or no.

12 MR. GRENDI: I don't understand

13 this question.

14 MR. SCHMIT: She's asking me --

15 she's got a question in mind. She

16 can answer it and we will get beyond

17 it.

18 A. Sorry, I don't mean to be rude, but

19 I need to know the question.

20 Q. Okay. Your company, Golden Springs

21 does work for clients, right?

22 A. Correct.

23 Q. You've referred to Golden Springs as

24 a family office, correct?

25 A. Correct.

1 Yvette Wang

2 Q. Are any of Golden Springs' clients
3 from a source other than Mr. Guo?

4 MR. GRENDI: Objection. This
5 has no relevance to this.

6 MR. SCHMIT: It does. They
7 signed the interrogatories and we're
8 not getting much information on
9 anything else. I have to try to work
10 through these issues and find out
11 what's going on here.

12 MR. GRENDI: You're asking
13 about clients other than the parties
14 that are involved in this action.

15 MR. SCHMIT: I haven't asked
16 for the identification.

17 Q. I want to know, is Golden Springs
18 Mr. Guo's family office?

19 A. No.

20 Q. Then are there other clients for
21 Golden Springs that are introduced by
22 individuals or come from sources other than
23 Mr. Guo?

24 A. Yes, we do have.

25 Q. Now, the family that you work for is

1 Yvette Wang

2 located in Mainland China?

3 A. And Hong Kong.

4 Q. And it is a single family?

5 A. Not only one family.

6 MR. SCHMIT: Can I get this

7 marked as Exhibit 4?

8 (Whereupon, at this time, the

9 reporter marked the above-mentioned

10 research agreement as Wang Exhibit 4

11 for identification.)

12 BY MR. SCHMIT:

13 Q. I'm going to hand you what's been

14 marked as Exhibit 4. It's entitled research

15 agreement, January 1, 2018. And it's Eastern

16 1 through Eastern 4.

17 Do you have that in front of you?

18 A. Yes.

19 Q. Have you ever seen this document

20 before?

21 A. Yes.

22 Q. Who produced -- I mean, not --

23 Eastern indicates you guys produced it in

24 this litigation. But do you know who drafted

25 or generated this document?

1 Yvette Wang

2 A. I heard this was drafted by

3 Strategic Vision.

4 Q. Now, you heard that; who did you

5 hear that from?

6 A. Mr. Guo.

7 Q. Did Mr. Guo hand it to you and say,

8 This is a draft prepared by Strategic Vision?

9 A. Yes.

10 Q. What did he say about it, anything

11 in particular?

12 A. He said he wants me to review and to

13 finish this contract.

14 Q. And did you do that?

15 A. Yes.

16 Q. During the review process, did you

17 have conversations with Mr. Guo?

18 A. I did.

19 Q. Generally speaking, what were the

20 tenure of these conversations as you drafted

21 the -- as you filled in and finished the

22 contract?

23 A. Sorry, can I ask you, what is your

24 question?

25 Q. Just tell me about the conversations

1 Yvette Wang

2 you had with Mr. Guo as you filled in and
3 finished the contract.

4 A. He asked me to review the contract,
5 and he mentioned about, like, the deposit,
6 like price and he explained his request to
7 me, asking me to check whether that is
8 already included in the contract.

9 Q. Whether the deposit and price were
10 included?

11 A. The terms, including the deposit,
12 payment, whether they are correct, whether
13 they are included in the contract.

14 Q. Now, how would you know whether they
15 were correct or not? Did he tell you what
16 they should be?

17 A. Yes.

18 Q. And did you conclude they were
19 correct or were they included in the
20 contract?

21 A. I reviewed and something was not the
22 same with what he told me. So I explained to
23 him and he asked me to finish the review and
24 try to revise it.

25 Q. And what was that issue?

1 Yvette Wang

2 A. I don't remember that clearly. It's
3 about Strategic Vision called a waterline.
4 Mr. Guo, he doesn't like that. And in his
5 understanding, that should not be a
6 waterline, which is defined by Strategic
7 Vision.

8 Q. And what was your understanding of
9 what was meant by waterline?

10 A. Strategic Vision, Ms. Wallop told me
11 and that is a waterline in the tank which can
12 keep the project and team, her team, working
13 and produce the reports. By short term,
14 waterline means money. And Strategic Vision,
15 I mean, Ms. Wallop requested a certain amount
16 of money paid, which maintain her team and
17 her research.

18 But the argument is, Mr. Guo, he
19 would like to keep, we call it a la carte.
20 Like, I need how many reports, I pay how many
21 reports. If I don't need that amount of
22 reports, and we should not go the waterline.
23 The waterline is a, if I may describe it as a
24 lock-in price or lock-in money, which no
25 matter how many reports the client request,

1 Yvette Wang

2 and we have to pay that, which in Mr. Guo,
3 his understanding, is not fair and not
4 practical.

5 Q. Now, the waterline, is this a
6 reference -- does this have anything to do
7 with the million dollar deposit?

8 A. No. One million dollar deposit has
9 nothing to do with waterline. Waterline is
10 Ms. Wallop and Strategic Vision requested the
11 client of this contract to pay \$750,000 per
12 month, no matter how many reports the client
13 requested or Strategic Vision provided. That
14 money must be paid.

15 And the explanation and the reason
16 Ms. Wallop explained to me many, many times,
17 hours, said that waterline permit her to keep
18 her team in our country or other district to
19 investigate. And that is her common
20 standard, in her business, and in her called
21 this, industry, which in my understanding is
22 her investigation industry and the business.

23 And she repeatedly told me that is
24 already very nice and reasonable waterline to
25 Miles Guo, and that is mandatory to this

1 Yvette Wang

2 project. So we spent hours, hours, hours to
3 negotiate about this waterline.

4 Q. And the negotiations, what did they
5 lead to? What was the final agreement in
6 your view?

7 A. We had, I remember, we had totally
8 three meetings. And by the end, compromised.

9 Q. How did you compromise? Is it
10 reflected in the final agreement?

11 A. Correct.

12 Q. Why don't you pull out the final
13 agreement and show me where that compromise
14 is reflected? It's Exhibit 2.

15 A. So you want me to explain what is
16 compromise?

17 Q. Well, I asked you whether the
18 compromise -- you said there was a
19 compromise. And I asked you if it was in the
20 final agreement. I believe you said yes?

21 A. Yes, I said that.

22 Q. Now you've got the final agreement
23 in front of you and I would like you to point
24 out where it is reflected.

25 (Witness peruses document.)

1 Yvette Wang

2 A. Yes, it's on page 4. If you see
3 second paragraph, it is agreed by both
4 parties that for the first three months of
5 this agreement, January, February and March
6 2018, that the payment of 750,000 U.S.
7 dollars will be wired per our instruction to
8 our U.S. bank account. And after that there
9 is a recap term. What is the recap? Oh,
10 yes. It is also agreed by both parties that
11 after the March reports and the payments are
12 made, that all involved parties will meet to
13 recap the accounting.

14 Q. What does that mean in your view?
15 What is your understanding of that term?

16 A. That means in the very beginning,
17 Strategic Vision, I mean, Mrs. Wallop
18 requested \$750,000 per month for 12 months.
19 And, obviously, the client, I mean, Mr. Guo,
20 they don't like that, and they didn't agree.

21 Q. They did or did not agree?

22 A. They did not. So the compromise
23 here is that recap. Finally, Mrs. Wallop
24 advised or stressed it for the first three
25 months, please pay 750,000 per month. And

1 Yvette Wang

2 after the first three months, by the end of
3 March, let's recap. See, so you guys still
4 pay me 750,000 or there's a lower or higher,
5 she called, waterline.

6 Q. So the agreement for the first three
7 months it was going to be 750,000 for
8 January, 750,000 for February and 750,000 for
9 March, right?

10 A. Correct.

11 MR. GRENDI: Objection. You
12 can answer.

13 A. Waterline.

14 Q. Were those amounts ever paid?

15 A. No.

16 Q. That was 750,000 per month, not
17 total, right?

18 A. Correct.

19 Q. How about the -- what is your
20 understanding of the fourth paragraph down?

21 The pricing for 30-year units or deliverables
22 per year remains a constant \$9 million per
23 year or 750,000 per month for 12 months?

24 A. You are pointing the correct point.

25 This is Mrs. Wallop called waterline, which

1 Yvette Wang

2 she is able to maintain her investigation
3 team waterlined. And she said that is
4 mandatory. That is if you want this project,
5 you have to pay minimum to keep waterline.

6 Q. In other words, that in part
7 encompassed what it was going to cost
8 Strategic Vision to keep teams out in the
9 field and available in order to do the work
10 for Eastern Profit, right?

11 A. Based on her explanation, she said,
12 yes, that is professional and that is a
13 mandatory request.

14 Q. And that ended up in the final
15 contract?

16 A. Correct.

17 Q. Whose initials are on the bottom
18 right corner of Exhibit 2? There seem to be
19 initials on each page. Whose are those?

20 A. That is mine.

21 Q. So is F.C.W., Ms. Wallop's?

22 A. Yes.

23 Q. And then the other initial is yours?

24 A. Correct.

25 Q. And then on page 5, production

1 Yvette Wang

2 number Eastern 9, that is your signature

3 there, right, on the right-hand side?

4 A. Correct.

5 Q. So that was one issue, the waterline

6 we will call it, that Mr. Guo raised with

7 you.

8 Did he raise any other issues when

9 he saw the draft or the incomplete draft?

10 A. She asked me to check about the

11 deliverable of reports. In my understanding,

12 when she asked me to check, he was already

13 told by Strategic Vision, I mean Mrs. Wallop,

14 how many reports, how frequency the reports

15 will be provided.

16 So Mr. Guo asked me, because he

17 doesn't read English at all. So he ask me to

18 check whether that reports deliverable

19 schedule is included in here as his

20 understanding.

21 Q. Was it?

22 A. Yes. Close, almost.

23 Q. Did you make or request any changes

24 based on what Mr. Guo said?

25 A. I didn't.

1 Yvette Wang

2 Q. Was a translation of this document

3 ever provided to Mr. Guo?

4 A. I orally translated for him.

5 Q. And he speaks Mandarin?

6 A. Correct.

7 Q. So you read line by line and got his

8 okay to the final agreement, right?

9 A. Correct.

10 Q. Okay. What other issues? There is

11 deliverables, waterline; any other issues

12 that Mr. Guo raised with you?

13 MR. GRENDI: Objection of form.

14 You can answer.

15 A. No. That is the main two parts.

16 Yes.

17 Q. What about the deposit? Did he

18 raise any issues with respect to the deposit?

19 A. Oh, you reminded me. Because I

20 remember clearly when I went through this

21 draft with Mr. Guo, I pointed out, I said

22 that one million deposit in advance is a lot.

23 Because I am a project manager, so I feel I

24 should remind him, this is a huge amount of

25 money to pay as a deposit.

1 Yvette Wang

2 And I remember Mr. Guo said,
3 Mrs. Wallop and Mike, they are respectful
4 people. And I trust them. They are
5 reliable. And before they even ask three
6 million as a deposit in this contract, now
7 they reduced by one million, and let's just
8 keep that. I remember that conversation.

9 Q. So ultimately you agreed to the
10 million dollar deposit, correct?

11 A. That's right. As a project manager,
12 you know, I pointed out my concern, if he
13 insisted then I just let it go.

14 Q. Did you guys ever discuss any
15 mechanism by which you might be able to get
16 that million dollar deposit back if something
17 wasn't done or things didn't work out under
18 the contract?

19 A. You mean when I was discussing with
20 Mr. Guo?

21 Q. Or that you heard of or had been
22 educated about.

23 A. No, I don't remember that clearly.

24 Q. Do you remember it at all?

25 A. No.

1 Yvette Wang

2 Q. Now, ultimately, you're saying ACA

3 Capital Limited made the million dollar

4 deposit?

5 A. Correct.

6 MR. GRENDI: Objection of form.

7 You can answer.

8 Q. On whose orders did they do that?

9 A. I'm sorry, what is your question?

10 Q. On whose orders did they do that?

11 Why did they do that?

12 A. I was not involved in that

13 instruction communication. But I guess it's

14 only my guess, between Eastern and ACA.

15 Q. Eastern and who?

16 A. ACA Capital.

17 Q. Who on behalf of Eastern would

18 have --

19 MS. TESKE: Objection.

20 A. Obviously, Mr. Han, from the paper.

21 Q. Do you know that or have you seen

22 anything that would suggest he gave the order

23 to wire the million dollar deposit?

24 A. No. I was not involved in that

25 process.

1 Yvette Wang

2 Q. Did you ever discuss it with Mr.

3 Guo?

4 A. About what?

5 Q. The deposit being made.

6 A. Oh, Mr. Guo send me the receipt, the
7 wire transfer receipt. And then told me to
8 send a text message to Mrs. Wallop about this
9 one million deposit paid.

10 Q. And what did -- what was your
11 reaction to getting this receipt, this one
12 million dollar receipt?

13 A. I was shocked.

14 Q. Why were you shocked?

15 A. Because there was even no contract
16 executed and signed. And the money was
17 already paid. And in my understanding, this
18 is a huge, huge, mistake. Accident.

19 Q. So who did you talk to about that?

20 A. I texted Mrs. Wallop.

21 Q. And what did you tell Mrs. Wallop?

22 A. If you have my Signal message with
23 her, I remember I texted her. I said, This
24 deposit was already wired to you, even
25 without the contract signed. And kind of

1 Yvette Wang
2 like shows the seriousness. And if you would
3 like to continue to do this project, and we
4 will stay -- we will stay with our terms
5 which is our negotiation. I was very insist,
6 if you do not agree, kindly, please, return
7 the one million deposit back, and sorry for
8 the inconvenience. You have my Signal
9 message. I remember that.

10 Q. And when you say the contract as
11 agreed, in other words, no more changes to
12 the contract, we need to sign it as is; is
13 that fair?

14 A. Correct. Sign my version.

15 Q. Okay. And, ultimately, when you say
16 your version, the one that was existing at
17 the time the million dollars was paid, right?

18 A. Correct.

19 Q. Were any changes requested or made
20 to that contract?

21 MR. GRENDI: Objection. You
22 can answer.

23 A. You mean when?

24 Q. After the million dollars showed up,
25 did Ms. Wallop or anybody else on behalf of

1 Yvette Wang

2 Strategic Vision request any changes?

3 MR. GRENDI: Objection. You
4 can answer.

5 A. They obviously requested and they
6 did, because the version by that wire
7 transfer was made, my version was different
8 from the final version. This is from
9 Mrs. Wallop, this version (indicating).
10 There was -- there is some difference in
11 there still.

12 Q. So changes made after the wire was
13 received?

14 A. Correct.

15 Q. What changes were those?

16 A. That first three months waterline
17 must be paid after that recap. That is the
18 main change.

19 Q. That's a change you requested,
20 though, right?

21 A. No. That was not a change I
22 requested. Before that, I request a la
23 carte. Like how many reports, the client
24 buy, pay how much. There's no waterline.

25 Q. When did you have that conversation

January 31, 2019

67

1 Yvette Wang

2 with Ms. Wallop?

3 A. The date is -- contract was signed
4 January 6th; that is one week before that
5 date. It's very end of December, beginning
6 of January.

7 Q. Any other changes?

8 A. No. Mainly that is the most heavily
9 biggest argument.

10 Q. Had Ms. Wallop told you that's how
11 it had to be prior to the wire being
12 received?

13 MR. GRENDI: Objection. You
14 can answer.

15 A. Sorry, what is your question?

16 Q. Did this waterline concept, you had
17 discussed it with Ms. Wallop prior to the
18 wire being received or is this a conversation
19 you guys had after ACA Capital sent the
20 money?

21 A. Oh, the waterline conversation
22 happened from the first second, from the very
23 beginning. And let me make it precise. Even
24 before the one million wired, I mean, from
25 the very beginning, when I was discussing

1 Yvette Wang

2 with her directly.

3 Q. And Ms. Wallop said from the
4 beginning that with respect -- there has to
5 be this waterline concept?

6 A. Correct.

7 Q. And you conveyed that to Mr. Guo?

8 A. I post a request and message to Mr.
9 Guo. I told him this is what they call
10 waterline, they must have.

11 Q. And when would you have given that
12 message to Mr. Guo?

13 A. You mean when, right?

14 Q. When, yes.

15 A. From my first meeting with
16 Mr. Wallop about this project.

17 Q. About when was that?

18 A. Sorry, what is the question?

19 Q. About when was that?

20 A. What time, right?

21 Q. Yes.

22 A. By the very end of December 2017. I
23 don't remember that date.

24 Q. So it was December 2017 Ms. Wallop
25 by then had said, Look, there has to be a

1 Yvette Wang

2 waterline. And you told Mr. Guo this is the
3 position Strategic Vision is taking; is that
4 fair?

5 A. That is fair. I remember my first
6 meeting with Ms. Wallop about this project
7 was in the very end of December, in
8 Mrs. Wallop's house in Virginia. That was
9 our first meeting. And the waterline problem
10 happened from that moment.

11 Q. When did you see this final version
12 of the draft, the final agreement for
13 execution?

14 A. The final version of this contract,
15 the first time I saw was on January 6th, the
16 date which was -- this was signed.

17 Q. What was your reaction to it? Who
18 was at that meeting? Was anybody present?

19 A. Only Mrs. Wallop and me.

20 Q. Where did that take place?

21 A. Ms. Wallop's house, in Virginia
22 home.

23 Q. And what did you tell Ms. Wallop
24 after you looked at the contract?

25 A. I remember I went through the

1 Yvette Wang

2 contract. Then I saw that recap after first
3 three months.

4 Q. And the recap was part of what you
5 had requested, right?

6 A. No.

7 Q. Not at all?

8 A. Not as -- that is not my request at
9 all. That is Ms. Wallop. She stressed it,
10 and she put in the draft. And in my
11 understanding, that was a compromise. Like,
12 okay, now, let's recap by the end of three
13 months about the waterline. At least give a
14 chance to recap, instead of request you must
15 pay for all the 12 months, right? To me,
16 that is a little bit better. So I feel that
17 is a compromise.

18 Q. Before signing it, did you pick up
19 the phone and call anybody?

20 A. I called Mr. Guo.

21 Q. What did you tell Mr. Guo about that
22 agreement?

23 A. I told him, I said, This is still
24 not my contract. Not my version. And I
25 translated to him briefly about the recap,

1 Yvette Wang

2 that part.

3 Q. And what did he say?

4 A. He said, you just go ahead to sign

5 it. And we need this project started.

6 Q. Are there any other provisions you

7 went over with Mr. Guo on the phone?

8 A. I emphasized again to him about the

9 report delivery schedule, which is weekly

10 report in the first month, and then there

11 should be a preliminary report for the first

12 month, and then after first month, there

13 should be at least a monthly report every

14 month. And some of the research, the reports

15 will be based on the request from the client.

16 So that's the two main point I emphasized

17 again to him.

18 Q. Why did you emphasize the report

19 issue to Mr. Guo?

20 A. Because that was in the first

21 discussion when I saw this project with Mr.

22 Guo. And -- yeah, that's the two points he

23 really cares about.

24 Q. The report and what it was going to

25 cost?

1 Yvette Wang

2 A. Yes.

3 Q. What did he say in regards to the
4 reports?

5 A. You mean --

6 Q. The language, when you told him over
7 the phone, Remember, look, these are the
8 reports, this is when it is going to come in,
9 what was his reaction?

10 A. You mean by 1/6?

11 Q. Yes. As I understand you're having
12 a telephone conversation with him on January
13 6th?

14 A. You're right.

15 Q. What did he say about the reports?

16 A. He said confirmed, okay.

17 Q. The word "report" appears several
18 times in the agreement. What is your
19 understanding of the word report?

20 A. You mean my understanding, personal?

21 Q. Well, why don't we start with yours
22 and if you have reason to think it's
23 different than Eastern, you can let me know.

24 A. In my understanding, the report, as
25 the, I mean, project manager, if I may call

1 Yvette Wang
2 myself, a little bit, and the report should
3 be in black and white. It's solid, reliable,
4 and there is value. And I mean, valuable
5 information in the deliverable, which we call
6 the report, and which should be delivered
7 without delay based on the report deliverable
8 schedule of this contract signed to the
9 client. I mean, as a project manager, that
10 is my understanding. First the quality,
11 second the timeline.

12 Quality means you cannot deliver
13 garbage or advertisement or Wikipedia or even
14 Russian language stuff. Because that is not
15 valuable and they are garbage, nonsense.

16 Second, timeline. And you should
17 deliver the report based on the contract
18 signed in here, which agreed by both sides.
19 That is the weekly report, for the first
20 month, and monthly report for the following
21 month, which never happened.

22 Q. What is a progress report, if you
23 look on page 2? What is a progress report?

24 A. Which paragraph are you referring
25 to?

1 Yvette Wang

2 Q. The contractor will produce a
3 progress report. What is -- compared to a
4 general report, what is a progress report?

5 (Witness peruses document.)

6 A. Progress reports includes, in my
7 understanding, again, as a project manager,
8 first that should include what is happening.
9 What is the team. What is your mechanism.
10 And the second mainly that is, I mean, the
11 first part should be like 30 percent or 20
12 percent of the whole progress report. And
13 the rest of the 80 or 70 percent of progress
14 report, that should be valuable. Valuable
15 means that, okay, there are information in
16 there, valuable, instead of having zero
17 valuable information and only garbage.

18 Q. Well, what's a preliminary report as
19 opposed to an overall report, a progress
20 report?

21 A. The preliminary report, in the first
22 month, in my understanding, that should be a
23 conclusion report or January, big report for
24 the first month. Why the first month need
25 preliminary report, because that was the

1 Yvette Wang

2 beginning of this project.

3 So you may include who is your team,
4 who is your team member, who is your project
5 manager, what is your strategy or what is
6 your mechanism or working. That's why that
7 happened in the first month.

8 Why there is no preliminary report
9 in the second and third month, the reason is
10 the first month needs all of that
11 information. Not only the valuable
12 information which they worked, but also their
13 general and detailed information of their
14 investigation team, their work mechanism, at
15 least who is the project manager or how they
16 work. Fair enough?

17 Q. What about comprehensive historical
18 research report? Does that differ any from
19 kind of this overall report concept or
20 progress report or preliminary report?

21 A. Comprehensive historical research
22 report within three months, in my
23 understanding --

24 Q. This is your understanding as a
25 project manager?

1 Yvette Wang

2 A. Correct. I am sorry about that.

3 Q. That's all right.

4 A. So comprehensive, within three

5 months, which is a bigger report than the

6 report of first month and the second month

7 and third month. That should be a kind of

8 like all together, like summarize. And then

9 they have all the information, I mean,

10 valuable information in there. They have

11 their whole team reported in here. And then

12 they may decide, because there is a recap,

13 they may decide by the end of third month,

14 how they will proceed for the next three

15 quarter of that year, that is my

16 understanding.

17 Q. When you say this is your

18 understanding as a project manager, how did

19 you gain this understanding of these terms?

20 A. How did I get this?

21 Q. Yes.

22 A. From my work experience.

23 Q. And what kind of work experience was

24 that and for who?

25 A. For who or from who?

1 Yvette Wang

2 Q. However -- your work experience.

3 You said you gained this from your work

4 experience. Have you done investigative

5 contracts before?

6 A. Oh, that is better understanding for

7 me.

8 I'm a project manager and I work for

9 many different projects. I don't mean

10 investigation project. For example, I build

11 house, right? I'm managing like the media

12 project. This is a common knowledge and

13 common sense as a project manager.

14 Q. Well, putting aside -- have you ever

15 been a project manager on a, you know,

16 confidential research of individuals?

17 A. Sorry, can you repeat your question?

18 Q. Have you ever been a project manager

19 for any contract remotely close to the one we

20 have marked as Exhibit 2?

21 MR. GRENDI: Objection. You

22 can answer.

23 A. I believe this is new to me. So

24 that's why I was educated, educated by

25 Strategic Vision and Ms. Wallop, saying,

1 Yvette Wang

2 Yvette, you are new to this kind of industry,
3 I remember that clearly, and she said, we
4 never communicate by e-mail and all the
5 reports and deliverable we must hand over
6 face to face. No e-mail, no phone call.

7 That's why, for example, like your
8 project, Mike, another associate of Ms.
9 Wallop, will fly himself to other country,
10 including Swiss, Switzerland, or other
11 countries in Asia, to face to face meet their
12 project manager and engineer, to receive
13 their deliverable.

14 So I'm talking about my experience
15 to be educated by a professional people in
16 this so-called industry. So to answer your
17 question as this kind of project to me is new
18 and fresh, and I was educated a lot.

19 Q. Did you discuss with either Mr. Guo
20 or Mr. Han what they expected the reports to
21 be prior to execution?

22 A. They expected the reports or
23 information are valuable.

24 Q. But did they talk in terms of the
25 form and how they would be delivered,

1 Yvette Wang

2 anything along those lines?

3 A. The form? I don't understand your
4 question.

5 Q. Flash drive, in person, e-mail; how
6 was it supposed to be delivered based on your
7 conversations with Mr. Guo and Mr. Han?

8 A. Oh, basically, the first time I was
9 told how the deliverable or report should be
10 transported was, I heard it from Ms. Wallop.
11 And she clearly told me that, no e-mail, no
12 phone call.

13 Q. No written report?

14 A. No written report.

15 Q. No memo, no memorandum?

16 MR. GRENDI: Objection.

17 Q. You weren't expecting a memo to be
18 delivered?

19 A. What do you mean memo?

20 Q. A written memorandum.

21 A. Are we talking about the --

22 Q. The report.

23 A. Are we talking about the information
24 in a report? I'm confused by you.

25 Q. The reports. We're talking about

1 Yvette Wang

2 the definition of the report in the
3 agreement. Did Ms. Wallop ever suggest she
4 was going to write a written report out in
5 any way, shape or form?

6 A. She said the report should be
7 delivered by flash drive.

8 Q. By who?

9 A. Flash drive. USB key, thumb drive.

10 Q. And what was your -- did she ever
11 discuss what was going to be on the flash
12 drive or USB key?

13 A. You mean when?

14 Q. What. What was going to be on it?

15 A. Oh, the report.

16 Q. Did she ever get into detail of what
17 the form and substance of the report was
18 going to be?

19 A. I remember she mentioned that will
20 be the valuable information, because she
21 presented herself and her team as the best in
22 this industry. So she guaranteed again and
23 again the information we will receive, they
24 are valuable and they are in compliance with
25 Mr. Guo's request.

1 Yvette Wang

2 Q. Okay. We will get to the definition

3 of valuable. But I just want to be clear.

4 Now we're going to deliver flash drives in

5 person for these reports, right?

6 A. Correct.

7 Q. Did you have an understanding of

8 what was going to be on the flash drive, not

9 just valuable information, but as far as form

10 or substance, letters, memorandums,

11 handwritten notes?

12 A. Oh, okay.

13 Q. Recorded conversations, what was

14 going to be on there?

15 A. That is very helpful. In my

16 understanding, based on our discussion about

17 the contract, based on --

18 Q. In discussion with who, if I can

19 just ask you?

20 MR. GRENDI: Objection. You

21 should let the witness answer, and I

22 think it's probably getting difficult

23 for the court reporter to keep up.

24 MR. SCHMIT: We're doing fine

25 here.

1 Yvette Wang

2 Q. Go ahead.

3 A. Where should I start?

4 Q. Go ahead. Do you need it read back
5 here?

6 A. Based on my discussion with Ms.
7 Wallop, based on my discussion with Mr. Guo,
8 that the report could possibly include, like,
9 financial, like -- because I remember Ms.
10 Wallop described their capability about their
11 technology to the bank system.

12 For example, before a contract
13 signed, she went to New York, meet with Mr.
14 Guo, and she described their capability, said
15 they already in a certain bank system.

16 I'm talking about Ms. Wallop, her
17 team. They were in, entered into a certain
18 bank's system. And she said her people tried
19 to climb on the wall and they did that, and
20 they saw the bank information in there. And
21 they are huge money.

22 And then Ms. Wallop even asked Mr.
23 Guo, do you want that money? Give me your
24 bank account so we can move the money. And
25 Mr. Guo refused immediately. So based on my

1 Yvette Wang
2 understanding that the report should include
3 the information or related information about
4 financial, which are not our request, which
5 should be legal, because Mr. Guo told Ms.
6 Wallop clearly, you are doing something
7 illegal. And I am not stealing money, and I
8 don't need the money.

9 Q. We will get back to that. Again, I
10 just want to finish one line of questioning
11 before we go down that road.

12 The report, though, on the flash
13 drive, Excel spread sheets, any
14 representation that you would be supplied
15 with Excel spreadsheets?

16 A. You mean the final report?

17 Q. Anything. Any report. The flash
18 drive you would receive. I want to know
19 physically, when you plugged it in and you
20 looked at the screen, what did Eastern Profit
21 understand would pop up?

22 A. This could be like Excel, like Word,
23 or PDF or video. Whatever the format.

24 Q. Was there a specific agreement as to
25 the format of the information?

1 Yvette Wang

2 A. Agreement of format? It could be
3 any format, in my understanding. But the
4 information Eastern requested is illegal and
5 is checkable from resources or database.

6 Q. You use the term throughout this
7 time --

8 MR. GRENDI: Why don't we take
9 a break at this time? I know you're
10 about to ask a question.

11 MR. SCHMIT: Why don't I just
12 ask and then we will take a break.

13 Q. You used the term several times the
14 information must be valuable. What did you
15 mean by that? What was your understanding of
16 that?

17 A. Valuable, in my understanding, that
18 should be helpful to the client, as a project
19 manager.

20 Q. Did you ever discuss -- you keep
21 saying "as a project manager." I want to get
22 back to that before we break because that's
23 important to this whole line of questioning.

24 Did Mr. Guo ever explain to you what
25 he thought was going to be valuable?

1 Yvette Wang

2 A. At least they are real.

3 Q. No, no, did Mr. Guo ever exchange --

4 A. Yes, he told me.

5 Q. What did he --

6 A. They should be real. They should be
7 real message.

8 Q. What does "real" mean? What do you
9 mean by real?

10 A. Real means that it's true fact, real
11 message. Instead of -- let me give you
12 another example, maybe that will be helpful.

13 Q. You answered my question though.

14 Did you ever talk to Ms. Wallop
15 about what Eastern Profit considered was
16 valuable? Did you ever go, Ms. Wallop, this
17 is what we're looking for, this is what we
18 want?

19 A. We did. If you review the contract
20 signed, which is your Exhibit number 2, you
21 can see clearly reports A, B, C, the details.
22 That should be information.

23 Q. But we already covered that there
24 was no exact agreement as to format, right?

25 A. Format you mean Excel, Word, PDF,

1 Yvette Wang

2 Power Point?

3 Q. Yes. What was going to be on the
4 flash drive.

5 MR. GRENDI: I want to hop in
6 here. We requested a break, I know
7 you are continuing down this line of
8 questioning and you're obviously
9 entitled to. But can we have a
10 break, please?

11 MR. SCHMIT: Sure. Take a
12 break.

13 THE WITNESS: Thank you.

14 (Whereupon, a brief recess was
15 taken.)

16 BY MR. SCHMIT:

17 Q. We were talking before the break,
18 Ms. Wang, about what would be considered,
19 quote unquote, valuable information.

20 Did you ever discuss that with Ms.
21 Wallop or Mike Waller, the other individual
22 you've mentioned?

23 A. About what?

24 Q. About what you considered to be
25 valuable or under the contract.

1 Yvette Wang

2 A. The valuable, the first thing they

3 should be truth, they should be true --

4 Q. No, no, did you discuss it?

5 A. Discuss it?

6 Q. Did you discuss your definition of

7 valuable with either Ms. Wallop or Mr.

8 Waller?

9 A. I didn't.

10 Q. Do you know of anybody on behalf of

11 Eastern Profit that did?

12 A. I believe Mr. Guo discussed it with

13 them.

14 Q. Why do you believe that?

15 A. Why I believe that? Because after

16 the discussion, I guess, again, they come up

17 this definition (indicating). So I read this

18 and I understand --

19 Q. What are you pointing to?

20 A. The page one until page two with all

21 the definitions regarding A, B, and C

22 research.

23 Q. I don't understand what's in the

24 contract, though. Were you aware of any

25 discussions Mr. Guo had with Ms. Wallop or

1 Yvette Wang

2 Mr. Waller about what the definition of what
3 you said is, quote unquote, valuable would
4 be?

5 MR. GRENDI: Objection. You
6 can answer.

7 A. Can you repeat your question?

8 MR. SCHMIT: Can you read it
9 back?

10 (Whereupon, at this time, the requested
11 portion was read by the reporter.)

12 A. Sorry, I still -- I don't quite
13 understand your question. So you're talking
14 about, am I aware Mr. Guo discussed with Ms.
15 Wallop and Mike about the valuable, the
16 definition of valuable?

17 Q. What he would consider valuable
18 under the contract.

19 A. I believe I did.

20 Q. You believe you did with who?

21 A. Mr. Guo discussed it with them.

22 Q. Okay. And why do you believe that?

23 A. Because Mr. Guo requested their
24 things or they offered their things. I mean,
25 this is the proof, this is the agreement.

1 Yvette Wang

2 Q. I mean, were you present for any
3 conversations about, you know, Gee, Ms.
4 Wallop, this is what I would consider
5 valuable, this is what I'm looking for?

6 A. Thank you. That is more easier for
7 me. No, I didn't. And I was absent in the
8 very beginning of this project. So in the
9 very beginning, which means before I started
10 to be involved in this project, and Mr. Guo
11 and Ms. Wallop and Mike and Mr. Han, you
12 know, Mr. Han Lianchao, we say L.C. in all
13 the correspondence, they discussed about
14 those things, I believe.

15 Q. Why do you believe that?

16 A. Because come out with this
17 (indicating). Otherwise where are they come
18 from?

19 Q. Are you aware of any specific
20 conversations along those lines, though?

21 A. I don't understand. Am I aware of
22 any conversation?

23 Q. Yes.

24 A. Yes.

25 Q. Which ones? When did they take

1 Yvette Wang

2 place? Who participated and what was said?

3 MR. GRENDI: Objection. You

4 can answer.

5 A. I will answer that. That take place

6 in New York.

7 Q. Okay.

8 A. And Ms. Wallop and Mike, they came

9 to New York to Mr. Guo, his apartment and did

10 a couple of meetings together with L.C. about

11 this project.

12 Q. And who is L.C. again?

13 A. Lianchao. Han Lianchao.

14 Q. And do they call in your text

15 messages Mr. Guo, New York, sometimes?

16 A. Correct, yes.

17 Q. And when was this meeting?

18 A. My guess is in November, start from

19 November, something, October or November.

20 Because I start to get involved by the end of

21 December. So before me, that is my guess.

22 It should have like in December or the

23 beginning or mid of -- no, in November or the

24 beginning or mid of December. That is my

25 guess.

1 Yvette Wang

2 Q. You weren't at this meeting in

3 New York, though?

4 A. I didn't attend the meeting about

5 this project with all of them together. I

6 didn't.

7 Q. In preparation for today's

8 deposition, did you attempt to educate

9 yourself on what may have occurred at that

10 meeting?

11 A. No, I didn't.

12 Q. What have you done in preparation of

13 today's deposition?

14 A. What I have done?

15 Q. What have you done to prepare for

16 today's deposition?

17 A. Oh, I went through the, like the

18 contract, the complaint, some documents which

19 from my lawyer.

20 Q. Did you go back to any books or

21 records of Eastern Profit to prepare?

22 A. No. I didn't.

23 Q. Are there any books or records for

24 Eastern Profit? Do they exist?

25 A. I have no idea. You should ask

1 Yvette Wang

2 them.

3 Q. Well, you're representing them here
4 today. You recognize that, right?

5 A. Yes.

6 Q. So you, as a representative, are not
7 aware of any books or records that belong to
8 Eastern Profit?

9 MR. GRENDI: Objection.

10 You can answer.

11 A. If I may, without offense, I should
12 be defined -- I represent them with limited
13 power of attorney on this project. So if you
14 ask me the whole history of the records of
15 Eastern, I'm sorry, I cannot help.

16 Q. No, I'm not -- do they exist? Do
17 you have any reason to believe they exist?

18 A. I didn't ask. I don't know.

19 Q. What have you done to prepare for
20 today's deposition, other than look at the
21 contract and the complaint?

22 A. Went through the exhibits, I believe
23 they are there. And went through some of
24 the -- I didn't went through all of it
25 because I don't have time. So roughly went

1 Yvette Wang

2 through all these papers.

3 Q. In other words, you looked at
4 documents that were produced in this
5 litigation?

6 A. Produced?

7 Q. Provided. Like, that are -- that
8 you gave to us or we gave to you in the
9 discovery process.

10 A. Because that happened almost like
11 one year ago. So I went through this paper,
12 trying to refresh my memory because I don't
13 remember quite clear some of the things.

14 Q. In other words, the events at issue
15 happened like a year ago; is that what you're
16 saying?

17 A. What do you mean?

18 Q. You said something happened a year
19 ago, so I had to refresh my recollection.
20 What happened a year ago?

21 A. This project.

22 Q. That's what I was asking.

23 A. Yes. That's why, you know, some
24 dates I don't remember. It's what you told
25 me, yeah.

1 Yvette Wang

2 Q. Did you meet or speak with anybody
3 in order to educate yourself about Eastern
4 Profit?

5 A. About Eastern Profit, no.

6 Q. Did you meet with your attorney to
7 discuss Eastern Profit?

8 A. No, I didn't.

9 Q. Did you have any telephone --

10 MR. GRENDI: Let me pop in. I
11 think there must be some kind of
12 misunderstanding here. Because we
13 did meet to prepare for this 30(b)(6)
14 deposition on Tuesday. I think maybe
15 she's confused about the designee as
16 her attorney.

17 A. My understanding, you mean discuss,
18 my attorney did ask me -- I don't know.

19 MR. GRENDI: Hold on, stop,
20 stop. I just want to be clear, she
21 shouldn't be discussing what I
22 discussed with her. I am just saying
23 that was preparation for this
24 30(b)(6).

25 Q. So on Tuesday you met with the

1 Yvette Wang

2 gentleman to your right?

3 A. Yes.

4 Q. Was anybody else present?

5 A. No. Only me and him.

6 Q. How long did you meet for?

7 A. Like two, three hours. Two hours.

8 Q. And you reviewed the documents that

9 we have identified?

10 A. Yes.

11 Q. Did you speak with Mr. Guo?

12 A. About what?

13 Q. About this deposition. Or Eastern

14 Profit, in preparation for this deposition.

15 A. I told him my date.

16 Q. Did you ask him any questions?

17 A. I didn't yet. What do you want me

18 to ask? I ask.

19 MR. GRENDI: Hold on. I'm just

20 going to pop in here. He's just

21 asking questions today, and you can

22 answer them. You don't need to offer

23 anything.

24 Q. Other than that you've reviewed some

25 documents, you met with Zachary, have you

1 Yvette Wang

2 spoken with anybody else about today's
3 deposition?

4 A. My colleagues. I told them don't
5 call me, because I will be in deposition.

6 Q. So logistically, logistics?

7 A. Yes.

8 Q. But the substance of the deposition
9 or to educate yourself about what Eastern
10 Profit is about, you didn't speak with
11 anybody else?

12 A. No.

13 Q. How about Mr. Chung Han, the
14 principal of Eastern?

15 A. About this deposition?

16 Q. Yes.

17 A. No, I didn't.

18 Q. What is his exact position with
19 Eastern?

20 A. He's the president of Eastern. It
21 should be on the paper here.

22 Q. It just says he's a principal.

23 A. Okay, the principal of Eastern.

24 Q. What does that mean?

25 A. You mean my understanding?

1 Yvette Wang

2 Q. Yes.

3 A. Boss. I don't know. I don't know

4 his official title.

5 Q. Is he an officer, director?

6 A. I don't know.

7 Q. Do you know what his duties and

8 responsibilities are?

9 A. I don't know.

10 Q. How did you know he was a principal?

11 A. Mr. Guo told me.

12 Q. If you look at Exhibit 3, would you

13 have personal knowledge of any of these

14 answers? Maybe you can just point out the

15 ones to which you would have personal

16 knowledge.

17 A. Personal knowledge about what?

18 Q. About the answers. Because you

19 verified these interrogatory responses and

20 I'm just wondering, you know, which ones you

21 knew personally, and if so, I'd like to know

22 how you came up with the information for

23 those responses.

24 MR. GRENDI: I'm just going to

25 object as compound. Do you want to

1 Yvette Wang

2 go through them? I mean, there's
3 quite a few.

4 MR. SCHMIT: I don't think it's
5 going to take too long. There's not
6 too many.

7 Q. Just point out the ones that you had
8 personal knowledge of, that you read the
9 question and you said here's the answer.

10 MR. GRENDI: I'm objecting
11 again. The witness will have to read
12 through these and go one by one.

13 MR. SCHMIT: You're kind of
14 coaching the witness now.

15 Q. Can you answer the question?

16 MR. GRENDI: Hold on,
17 objection. I'm not trying to coach
18 the witness.

19 MR. SCHMIT: I've asked the
20 question. She can react accordingly.

21 MR. GRENDI: You can answer.

22 A. Then are you asking that we go
23 through all the -- because this is --

24 Q. I have a question. Let me ask you
25 one way. Do you have personal knowledge of

1 Yvette Wang

2 any of the answers?

3 A. I have to go through.

4 Q. Okay. Go through, take your time.

5 (Witness peruses document.)

6 A. Personal knowledge, okay.

7 (Witness peruses document.)

8 A. Okay. Which one you want to ask?

9 Q. The question is, just identify which
10 ones you answered based on personal
11 knowledge.

12 A. Based on my personal knowledge, I
13 signed here that this is based on the best of
14 my personal knowledge.

15 Q. Okay. The best of your personal
16 knowledge?

17 A. Yes.

18 Q. Which ones?

19 A. All of them.

20 Q. So you knew that Mr. Han, prior to
21 seeing these interrogatories, was a principal
22 of Eastern Profit?

23 A. Which question?

24 Q. Number two.

25 A. Correct. Here, yes, I was told he

1 Yvette Wang

2 was a principal.

3 Q. So you had to be told that when you
4 saw the question, when you verified it,
5 somebody told you that information, right?

6 A. That's right.

7 Q. So you were educated on it. Is that
8 true with each of these answers? That's what
9 I'm trying to get at.

10 A. Correct.

11 MR. GRENDI: Objection. But
12 you can answer.

13 Q. So with each of these answers,
14 somebody had to tell you, with each of these
15 questions somebody had to tell you what the
16 answers were before you could verify it,
17 right?

18 MR. GRENDI: Objection. You
19 can answer.

20 A. Yes.

21 Q. Now, for example, who told you the
22 answer to number two?

23 A. Mr. Guo.

24 Q. How about the answer to number four?

25 A. Who told me this, right?

1 Yvette Wang

2 Q. Yes.

3 A. Mr. Guo.

4 Q. What is Mr. Guo's relationship with
5 Eastern Profit?

6 MS. TESKE: Object.

7 A. I believe I said that before.

8 Q. Well, tell me again.

9 MR. GRENDI: Objection. You
10 can answer.

11 A. I said he is advisor and consultant
12 to Eastern.

13 Q. You mentioned a client -- you
14 mentioned the client a couple of times. Is
15 Eastern Profit a client of New York Golden
16 Springs?

17 MR. GRENDI: Objection. You
18 can answer.

19 A. You asked that question before.

20 Q. Is it?

21 A. I said no, there's no official
22 contract.

23 Q. Is there an unofficial contract?

24 A. No.

25 Q. Do you work for anybody other than

1 Yvette Wang

2 New York Golden Springs?

3 A. No.

4 Q. Who signs your paychecks when you're
5 paid?

6 MR. GRENDI: Objection.

7 MR. SCHMIT: That's a fair
8 question. I'm not asking amounts.
9 It's a totally fair question.

10 There's no objection to that.

11 MR. GRENDI: You can answer.

12 Q. What entity pays you when you look
13 at your paycheck?

14 A. I refuse to answer, it's too
15 personal.

16 MR. GRENDI: I'm not
17 instructing the witness to do
18 anything.

19 I said you can answer the
20 question.

21 Q. I'm not asking the amount. When you
22 get a paycheck, what entity or individual
23 does it come from?

24 A. Golden Spring.

25 Q. When you had to discuss this

1 Yvette Wang
2 project, other than -- I'm not talking about
3 Ms. Wallop or Mr. Waller, did you have
4 conversations with anybody during the
5 negotiations or execution of the agreement,
6 other than Mr. Guo?

7 A. No.

8 MR. SCHMIT: If I can have this
9 marked as Exhibit 5.

10 (Whereupon, at this time, the
11 reporter marked the above-mentioned
12 screen shot of text messages as Wang
13 Exhibit 5 for identification.)

14 BY MR. SCHMIT:

15 Q. I'm going to hand you what's been
16 marked as Exhibit 5.

17 A. Thank you.

18 Q. If you could just -- it's a series
19 of screen shots of text messages, SVUS 61
20 through 76.

21 If you could just take a moment and
22 review it and let me know when you're ready
23 to answer any questions.

24 (Witness peruses document.)

25 A. Okay. You want me to finish?

1 Yvette Wang

2 Q. Yes. If you need more time to

3 review it.

4 (Witness peruses document.)

5 A. Okay. Thank you, I'm done.

6 Q. And just for Lianchao Han, you see

7 his name at the top?

8 A. Yes.

9 Q. Who is that again?

10 A. A gentleman from D.C.

11 Q. From Washington D.C.?

12 A. Yes.

13 Q. Does he work for Mr. Guo? Does he

14 work for Eastern Profit? Who does he work

15 for?

16 A. I don't know he works for. But he

17 doesn't work for Mr. Guo and Eastern.

18 Q. He doesn't work for New York Golden

19 Springs?

20 A. No.

21 Q. Why is he discussing the contract?

22 A. I don't know.

23 Q. He seems to be discussing the

24 contract on behalf of Eastern Profit, right?

25 A. It seems like, yes.

1 Yvette Wang

2 Q. You don't know why?

3 A. I don't know.

4 Q. You don't know -- what was your

5 understanding of his involvement in the

6 project?

7 A. Correct. My understanding, I heard

8 this Mr. Han, he is a friend of Wallop and

9 Mike. And he, obviously, help translation

10 for Mr. Guo as well. That is basically what

11 I know.

12 Q. What is your understanding of the

13 relationship between Mr. Guo and Lianchao

14 Han?

15 A. To me, it seems like they are

16 friends as well.

17 Q. Do you know how long Mr. Han has

18 known Mr. Guo?

19 A. I don't know.

20 Q. Estimate?

21 A. Estimate?

22 MS. TESKE: Object.

23 MR. GRENDI: Objection.

24 A. I don't know.

25 Q. A couple of years, five years, ten

1 Yvette Wang

2 years?

3 MS. TESKE: Same objection.

4 MR. GRENDI: Same objection.

5 A. I don't know.

6 Q. Do you have any idea?

7 A. I don't think that long, I mean, my

8 guess.

9 Q. You've met Mr. Han, right?

10 A. Yes, I did.

11 Q. When did you first meet him?

12 A. In New York.

13 Q. What time? When?

14 A. Late October, November of 2017.

15 Q. Who introduced you?

16 A. He was in Mr. Guo's apartment and I
17 went there and Mr. Guo introduced him to me.

18 Q. What is your understanding of why he
19 was with Mr. Guo that day?

20 A. My understanding, he's a friend of
21 him, otherwise why at his home, right?

22 Q. What did Mr. Guo tell you about Mr.
23 Han during the introduction?

24 A. He said Mr. Han is from Washington
25 D.C. And he is a real fighter for Chinese

1 Yvette Wang
2 rules of law and democracy as well and a very
3 good man.

4 Q. Do you know, is Mr. Han originally
5 from Washington D.C.?

6 A. Originally you mean what?

7 Q. Like where was he born?

8 A. Oh, he was born in Mainland of
9 China. He told me.

10 Q. Did he know Mr. Guo over in China?

11 A. I don't know. But I don't believe
12 so. Looks like not, my guess, again.

13 Q. Just one more question about the --
14 this has nothing do with this exhibit, but
15 about the million dollars deposit that ACA
16 Capital sent, right, they tried to claw it
17 back, right?

18 A. To get it back?

19 Q. Yes.

20 A. Yes. Sorry my language.

21 Q. That's fine. Who told them that
22 they should try to pull it back?

23 A. I don't know.

24 Q. Did you go -- when you found out
25 about the deposit, how did you find out about

1 Yvette Wang

2 it?

3 A. Mr. Guo sent me --

4 MR. GRENDI: Objection. You

5 can answer.

6 A. Mr. Guo sent me the wire receipt,

7 which I told you.

8 Q. Did you talk with anybody from ACA

9 Capital about it?

10 A. No, in my memory, no, no.

11 Q. Did Mr. Guo -- did you tell Mr. Guo,

12 We've got to get this money back, this is

13 crazy?

14 A. No, I didn't tell him. I mean, why

15 should I tell him?

16 Q. Do you know what ACA Capital was

17 told?

18 MR. GRENDI: Objection. You

19 can answer.

20 A. I don't know. I don't know that.

21 Q. Do you know if it was specifically

22 told that you have to pull this back because

23 no contract has been signed yet?

24 A. You mean I was told, right?

25 Q. No, no. ACA Capital, they're the

1 Yvette Wang

2 ones that were trying to claw the money back?

3 A. Oh.

4 Q. Do you know specifically what
5 instruction they were given or why they were
6 doing it?

7 A. I don't know that part. I don't
8 know.

9 Q. Mr. Guo never shared that
10 information with you?

11 MS. TESKE: Objection.

12 MR. GRENDI: Objection.

13 Q. Let's go back to Exhibit 5 here. If
14 you would turn to production number 65.

15 (Witness peruses document.)

16 Q. It says at the top, it says, Okay,
17 thanks, I don't think the New York guy is
18 serious.

19 Is it your understanding New York
20 guy is a reference to Mr. Guo?

21 A. Correct. That is my understanding,
22 yes.

23 Q. Okay. Do you know who this -- who
24 wrote that?

25 A. I don't know.

1 Yvette Wang

2 Q. If that's your answer, that's --

3 A. I guess, either from Mike or Ms.

4 Wallop. That is my guess. Because there's
5 only Lianchao's name here.

6 Q. Then it says, I have mixed feelings
7 about it, he wants to do it but wants to do
8 it as cheap as possible.

9 Do you see that?

10 A. Yes.

11 Q. And then you can see what the
12 response to that.

13 Do you know what these folks are
14 talking about here?

15 MR. GRENDI: Objection. You
16 can answer.

17 MS. TESKE: Same objection.

18 A. I don't know precisely. Because
19 this is the conversation between other two
20 people.

21 Q. Fair enough.

22 A. But maybe about this project, I'm
23 not sure.

24 Q. Was there ever any discussion about
25 pricing and Mr. Guo wanting to do it cheaper?

1 Yvette Wang

2 MS. TESKE: Objection.

3 MR. GRENDI: Objection.

4 A. With who?

5 Q. The project.

6 A. I have never had that discussion

7 with him.

8 Q. So to the best of your knowledge,
9 they didn't discuss doing it on the cheap or

10 anything along those lines?

11 A. I never --

12 MR. GRENDI: Objection. You
13 can answer.

14 A. I never heard cheaper, these words
15 from Mr. Guo's mouth.

16 Q. Did you hear anything along those
17 lines or something to that effect?

18 A. Sorry?

19 Q. Did you hear words other than
20 cheaper, maybe you don't like my word choice.

21 A. But close to this meaning, right?

22 Q. Yes. Conveying that he would like
23 to pay less.

24 A. No, no, to me. I didn't hear
25 anything about that.

1 Yvette Wang

2 Q. If you look at 66, that's the
3 production number on the lower right-hand
4 corner.

5 (Witness peruses document.)

6 Q. I talked with him and he says he
7 wants to do it, but would like to put in a
8 clause in the contract which says if you fail
9 to provide the deliverables as defined in the
10 scope, you should return the deposit. What
11 do you think?

12 Do you see that?

13 A. I saw this.

14 Q. You've seen it before today?

15 A. Yes.

16 Q. Where have you seen that statement
17 before?

18 A. We went through the exhibits.

19 Q. So on Tuesday you probably saw that?

20 A. Yes, probably.

21 Q. What is your understanding of what
22 Mr. Han is saying there?

23 MS. TESKE: Objection.

24 A. You mean this message?

25 Q. Yes.

1 Yvette Wang

2 MR. GRENDI: Objection.

3 A. Okay. You're really trying to ask
4 me to guess other people's message.

5 Q. No, I'm asking, do you have an
6 understanding of what is said there?

7 A. Fair enough. Let me read it.

8 Q. Please read it.

9 A. It looks like Mr. Han was
10 communicating with Mr. Guo as well about this
11 project, about the deposit, and deliverable
12 in the scope. That is my understanding,
13 saying, Failed to provide the deliverable as
14 defined in the scope, which agreed by both
15 sides, or agreed by the contract, and the
16 contractor should return the deposit.

17 Q. Did a clause like this ever end up
18 in the agreement?

19 MR. GRENDI: Objection. You
20 can answer.

21 A. I don't remember this is in the
22 final signed contract. No.

23 Q. You don't believe it is?

24 A. I don't believe that.

25 Q. Did you ever discuss it with Mr. Guo

1 Yvette Wang

2 and Mr. Han, that concept?

3 A. No, I didn't.

4 Q. If you can turn to 73.

5 A. Yes.

6 Q. It says at the bottom, please call

7 F. Do you know who F is?

8 A. I guess it's French Wallop, my

9 guess.

10 Q. Okay. That's your understanding.

11 MR. GRENDI: Objection.

12 Q. However, it says, Today Y came back
13 with major unreasonable changes as thing we
14 had agreed on in writing on December 12th.

15 Do you see that?

16 A. Yes.

17 Q. Who is Y?

18 A. I guess that's me.

19 Q. It's around the December 30th
20 timeframe. Do you recall any changes you had
21 asked for, requested at that time?

22 A. I don't remember that. I don't
23 remember, sorry.

24 Q. You don't remember a conversation
25 about that or any changes at the end of 2017

1 Yvette Wang

2 that you agreed or disagreed about?

3 A. First, I said I don't remember.

4 That doesn't mean I agree or disagree. I

5 really don't remember. Because the date, I

6 don't remember what happened. And then I

7 don't remember like what kind of a

8 conversation I came back. No, I don't

9 remember that.

10 Q. Do you recall any conversations you

11 had with Mr. Guo around that time of changes

12 he wanted?

13 A. I don't remember clearly.

14 Q. Do you remember just in a general

15 sense?

16 A. General sense, still about the

17 waterline, because that was the argue, you

18 know, the argue points. From the beginning

19 throughout the end.

20 Q. You guys wanted an a la carte pay as

21 the deliverables come in and Strategic Vision

22 wanted this waterline concept?

23 A. Correct, correct.

24 Q. And you guys discussed it at length

25 and many phone calls and meetings?

1 Yvette Wang

2 A. I think so. I believe so. I

3 believe so. If there is any, like, main

4 discussion, it's about -- should be about

5 that.

6 Q. How about the deposit concept? Does

7 looking at this refresh your recollection

8 about any conversations you had about the

9 deposit?

10 A. No. First discussion about the

11 deposit that was -- you remember I said,

12 three meetings and one meeting, that was the

13 conversation about deposit. And the next one

14 is that wire transfer about that one.

15 Q. You weren't involved in the

16 conversations about putting a clause in the

17 agreement that you could claw it back if

18 something went bad?

19 A. No.

20 Q. Or there is a disagreement?

21 A. No, I was not involved in that.

22 MR. GRENDI: Objection. I just

23 want to advise the witness to let him

24 finish asking the question before you

25 answer.

1 Yvette Wang

2 THE WITNESS: Sure.

3 Q. Did Eastern Profit do any research
4 on Strategic Vision?

5 A. I don't know.

6 Q. You don't know at all?

7 A. Sorry, please finish your question.

8 Q. I guess -- so you don't know if
9 Eastern Profit did any research on Strategic

10 Vision or French Wallop or Mike Waller?

11 A. I don't know.

12 Q. Did Mr. Guo ever instruct you to
13 look into either of them or the company in
14 general?

15 A. No.

16 Q. Did he ever inform you of what he
17 thought, and I'm talking pre execution,
18 inform you of what he knew about French
19 Wallop or Mike Waller or Strategic Vision or
20 anything along those lines?

21 A. Sorry, what is your question?

22 Q. Did Mr. Guo ever inform you, prior
23 to execution, what he knew or thought about
24 either Ms. Wallop, Mike Waller or Strategic
25 Vision?

1 Yvette Wang

2 A. No. He didn't request me to search
3 about them, no.

4 Q. Did he ever tell you what he already
5 knew about them?

6 A. Oh, yes, he did.

7 Q. What did he say?

8 A. He said, Ms. Wallop and Mike, they
9 were introduced to him, and they are from
10 Washington D.C. Kind of like -- I don't
11 remember clearly. Like they are very
12 experienced and they have a lot of resources
13 and contacts in Washington D.C. And he heard
14 quite a lot of history about the lady and the
15 gentleman, which the lady and the gentleman
16 told Mr. Guo about. Like, their experience,
17 like their family, not too private, like
18 their education, like their previous work
19 experience, like their clients, especially
20 some very important clients of Ms. Wallop and
21 Mike. And the project Ms. Wallop and Mike
22 they have been done, including very
23 significant clients of theirs and their name.

24 Yeah, pretty much like that, like,
25 they mentioned about their clients include

1 Yvette Wang
2 some Russian officials, some middle east,
3 like royal family member official, government
4 people. And, oh, yeah, Mr. Guo even show me
5 his notebook. There is one page on there,
6 and with handwriting some name. And they are
7 written by Ms. Wallop. And Ms. Wallop told
8 Mr. Guo they are all big clients of hers.
9 Yeah, many about that.

10 Q. Mr. Guo told you about that?

11 A. Yes.

12 Q. And what was your understanding of
13 when Mr. Guo would have learned all that
14 information?

15 A. You mean when, right?

16 Q. When, yes.

17 A. My understanding is in November,
18 December, when Ms. Wallop and Mike, they were
19 introduced to Mr. Guo. They started to meet,
20 have dinner, lunch together. That is the
21 time, yes.

22 Q. And as far as you know, would
23 anybody else, other than Mr. Guo, be present
24 at those dinners?

25 A. Other people, Han Lianchao, yes, he

1 Yvette Wang
2 presented those dinners and lunch meetings.

3 Q. Did you ever discuss with Mr. Chao
4 how -- Lianchao what was said at those
5 meetings or if he vetted the information or
6 what he thought about Strategic Vision or
7 French Wallop or Mike Waller?

8 MR. GRENDI: Objection. You
9 can answer.

10 A. I remember Mr. L.C., he described
11 close, similar, like what Mr. Guo described
12 to me about Ms. Wallop and Mike. Or if
13 something different is that before this
14 project, Mr. Han -- I mean, Lianchao, he
15 brought Ms. Wallop to Mr. Guo, his apartment,
16 tried to sell some real estate property to
17 Mr. Guo. So that was before this project.

18 And then I remember that was an
19 afternoon and Ms. Wallop brought a brochure,
20 a house called Evermay, E-V-E-R-M-A-Y, that
21 was a house called Evermay. And she kind of
22 like tried to sell that house to Mr. Guo.

23 Q. Were you present at this meeting?

24 A. I was there, yes.

25 Q. Hadn't Mr. Guo requested information

1 Yvette Wang

2 in real estate?

3 A. I don't know he requested or not.

4 Q. She just showed up out of the blue
5 with a brochure and said, How about this?

6 A. Yes.

7 MR. GRENDI: Objection. You
8 can answer.

9 A. Yes. That was -- that's why my
10 first knowledge is, I don't know what she is
11 doing for business.

12 Q. Is that what Mr. Guo said? How did
13 he describe the encounter?

14 A. What is your question?

15 Q. How did Mr. Guo describe the
16 encounter to you? Did he say that, Hey, I
17 never asked her to do that?

18 A. I didn't hear that from him.

19 Q. Did he look at the brochure?

20 A. Yes, he did.

21 Q. Was there any comment, Oh, this is
22 the house we talked about or anything along
23 those lines?

24 A. I don't remember that clearly.

25 Q. All right, it could be possible,

1 Yvette Wang

2 though, that Mr. Guo requested that
3 information and that's why it was brought to
4 the meeting, right?

5 A. I don't know what happened before
6 that meeting. But by that meeting, I saw she
7 was showing her brochure, explain the house
8 condition, like those kind of stuff.

9 Q. But you have no factual information
10 about why that brochure was brought to the
11 meeting?

12 A. I have no idea.

13 Q. Mr. Guo didn't tell you why it was
14 brought there?

15 A. No.

16 Q. Did you ask him?

17 A. Who ask who?

18 Q. Did you ask Mr. Guo?

19 A. About that house?

20 Q. Why the brochure was being discussed
21 at the meeting?

22 A. No, I didn't. Because that happens,
23 you know, not something quite special, so why
24 I ask all the details? No, I didn't.

25 Q. Were you aware of any trips to the

1 Yvette Wang
2 Washington D.C. area of where Mr. Guo or his
3 representatives were looking for real estate?

4 A. After that Evermay house was
5 introduced, then Mr. Guo asked me, Oh, you go
6 to have a look at that house. Then I went to
7 D.C. together with Han Lianchao and together
8 with Ms. Wallop and we tried to visit that
9 Evermay house.

10 Q. Did you visit any other real estate?

11 A. Yes. That is -- was a like four
12 hours about, four hours drive. And Ms.
13 Wallop drove --

14 Q. You mean four hours driving around
15 D.C.?

16 A. Four hours in car. Because Ms.
17 Wallop did not allow us to, like, quite
18 frequently go out of the car and eat. And
19 she said, You guys better stay in the car and
20 even put me on the back of the seat. She
21 said she doesn't want the camera take picture
22 of her and me together. And we were in a
23 car --

24 Q. Did you ask her why?

25 A. She -- I didn't ask.

1 Yvette Wang

2 Q. No?

3 A. I didn't ask. Kind of like she
4 explained, like there's cameras everywhere in
5 D.C., and like the people who looks like
6 common walk on the street, they might be like
7 spies or agent or some other people. I don't
8 remember clearly, something kind of like
9 that.

10 Q. What time of year was this? When
11 was this?

12 A. December, before this project. By
13 then I don't even know this project or hear
14 anything about this.

15 Q. But it's in December of 2017, right?

16 A. I don't remember the date.

17 Q. But the year 2017?

18 A. Oh, yes, that's right.

19 Q. And you now know that this project
20 had been discussed in meetings in October and
21 November of this year, right?

22 MR. GRENDI: Objection. You
23 can answer.

24 A. Which project?

25 Q. The project we've been discussing

1 Yvette Wang

2 for three hours now.

3 A. Okay. What is the question?

4 Q. It was discussed among Strategic

5 Vision and Mr. Guo prior to you being

6 introduced to it?

7 A. No. Even now I don't know.

8 Q. You don't know when that project was

9 first raised?

10 A. I have no idea. Even now I have no

11 idea.

12 Q. Did Mr. Guo ever tell you why he was

13 meeting with them?

14 A. No.

15 Q. In November and October of 2017?

16 A. He didn't tell me the reason.

17 Q. They were there in New York at his

18 apartment having discussions, though, right?

19 A. A discuss about what?

20 Q. Anything. I'm saying a meeting took

21 place. I just want to firm up that you're

22 aware of meetings in October and November of

23 2017?

24 MR. GRENDI: Objection. You

25 can answer.

1 Yvette Wang

2 A. Yes. Yes, there were -- I heard

3 there were meetings.

4 Q. You don't know what they were about,

5 though?

6 A. No.

7 Q. And then why were you -- why did you

8 go on this trip to D.C. to look at real

9 estate?

10 A. Because of the Evermay house.

11 Q. But why look at it?

12 A. Because Ms. Wallop introduced that

13 to Mr. Guo and Mr. Guo would like me to have

14 a check whether it's worth to buy or purchase

15 or introduce to other people. Just let me to

16 have a look at that.

17 Q. Was he looking to relocate to D.C.?

18 MR. GRENDI: Objection.

19 MS. TESKE: Same objection.

20 MR. GRENDI: I mean, I realized

21 that there's an excess here, but

22 where is this going? This is about

23 real estate.

24 MR. SCHMIT: I'm exploring her

25 credibility in conversations. This

1 Yvette Wang

2 is well within the 40 yard lines.

3 MR. GRENDI: Go ahead.

4 A. I don't know.

5 Q. You mean, Mr. Guo never told you why
6 you had to go look at this house?

7 A. No.

8 Q. Mr. Lianchao never told you why you
9 were in a car for four hours with a woman
10 driving around D.C.?

11 A. For Evermay, this house.

12 Q. But why? You don't know? I mean,
13 if you don't know, you don't know.

14 MR. GRENDI: Objection. I
15 just, if we're having like an
16 understanding issue, let's try to
17 work it out.

18 MR. SCHMIT: I am, that's why
19 I'm giving her an out.

20 MR. GRENDI: I think just maybe
21 slow down with your pace here.
22 Because the witness is trying to
23 answer and whatever. Just go ahead,
24 sorry.

25 Q. Do you know why you were looking at

1 Yvette Wang

2 that house?

3 A. I don't know.

4 Q. Did you ever ask, Why are we looking

5 at this house?

6 A. I didn't.

7 Q. What did you report back to Mr. Guo

8 about the house and the trip?

9 A. I told him. We had about like four
10 hours drive locked in a car, and we were --

11 Q. You were locked in the car?

12 A. Description. We were not allowed to
13 go out of the car, correct, okay? That's
14 fair enough. And then Evermay, that house,
15 we were supposed to go to visit that house,
16 but we didn't get access to go inside of
17 there at all.

18 So we were driving around, around
19 and four hours without clear, like objective
20 property, just to look around. And didn't
21 even enter into any house. I told him about
22 this. And then I told him that Evermay house
23 is a neighbor of a very big cemetery. So the
24 condition from outside, which I was able to
25 view, it's very bad maintained, not very good

1 Yvette Wang

2 condition. Seems like nobody live in there
3 for long time.

4 Q. And what was Mr. Guo's reaction to
5 that report?

6 A. He doesn't like cemetery.

7 Q. So the presence of the cemetery was
8 kind of a show stopper?

9 A. Show stopper? What do you mean show
10 stopper?

11 Q. That would be a deal breaker. He
12 wouldn't buy the house next to a cemetery?

13 MS. TESKE: Objection.

14 A. I don't even know he will buy that
15 or not, to be honest with you. But I can
16 tell you that is not the house he likes, if I
17 may, because that is a neighbor of a huge
18 cemetery.

19 Q. Did you ever ask Ms. Wallop why she
20 didn't think it was a good idea for the three
21 of you to be seen together in the D.C. area?

22 A. I didn't.

23 Q. Why not?

24 A. Because that was not polite, right?

25 Q. Did you ever ask Mr. Guo, Isn't this

1 Yvette Wang

2 a little odd?

3 A. I didn't. Because it's not polite,
4 to be honest.

5 Q. You weren't curious at all?

6 A. Curious about what?

7 Q. I mean, why do you think -- I mean,
8 curious as to why Ms. Wallop thought you
9 shouldn't be seen together in D.C.?

10 A. I was, to be honest, curious and
11 surprised after that four hours drive.
12 Because in my understanding, she was going to
13 try to sell that property. But I went there,
14 at least to have a very, like a check. She
15 didn't even get me in that house. And I was
16 in the car for four hours, almost like five
17 hours. I don't even have --

18 Q. You guys didn't discuss during this
19 time research at all or the project at all?

20 A. Which project, the house?

21 Q. The project you're testifying about
22 here today.

23 A. No, no. No word about that.

24 Nothing.

25 Q. Now that you know the nature of the

1 Yvette Wang

2 project, does it make sense as to why she

3 didn't want to be seen?

4 A. Which project, this one?

5 Q. Yes.

6 MR. GRENDI: I mean, the

7 defendant is allowed to be here but

8 we don't need commentary.

9 Q. When I say "project," we know it's

10 getting a little silly. You know the project

11 I'm talking about. But I'm just asking you,

12 now that you know the nature of the contract,

13 do you have a better understanding as to why

14 she didn't want any photographs of you guys

15 together?

16 A. Oh, I probably got your question.

17 That's why Wallop did not allow me and

18 Lianchao, especially me, go out and in the

19 car, because by then, she already know Miles

20 Kwok, who is Miles Kwok. And then, my guess,

21 again, because she is here, in this room, my

22 guess is she is afraid of like, we are like

23 Miles Kwok's group of people, and we might

24 bring, I don't know some risk or danger to

25 her personally. That's why she doesn't want

1 Yvette Wang

2 to be taken photo by chance me and her
3 together. That is my understanding.

4 Q. And how did you gain that
5 understanding?

6 A. Because it's weird. Like she
7 specifically told me that I gonna put you in
8 the back seat not in front for why reason?
9 By then, you know, even she did explain to
10 me, I will take whatever, you know, the owner
11 of car put me, but she specifically explained
12 that to me, made me feel so weird and
13 surprised by then, right?

14 Q. Do you understand why she might have
15 thought it was bad, though, not to be viewed
16 with you, given the project that was being
17 discussed?

18 MR. GRENDI: Objection. You
19 can answer.

20 A. Still I have no idea about this
21 project by then. I just feel it's weird. It
22 shouldn't be like that serious because I am
23 walking in D.C. and New York every day, I'm
24 in D.C. a lot of time, and in New York many
25 days. I was never killed, I was never

1 Yvette Wang
2 assassinated. And why you're so afraid of be
3 together with me?

4 Q. Well, wasn't there concern that it
5 would expose the fact that Strategic Vision
6 was being engaged to do research on certain
7 individuals?

8 MS. TESKE: Object.

9 A. You're talking about the property
10 project, real estate or this project?

11 Q. This project, the research project.

12 A. By then I have no idea about this
13 project.

14 Q. I know that, ma'am. We went over
15 that. You didn't know it when you were
16 sitting in the car, but now looking back
17 don't you think it made sense that there was
18 some concern because Strategic Vision was
19 going to be engaged?

20 MR. GRENDI: Objection.

21 Q. Based on what you know now sitting
22 here today?

23 A. No, I don't believe there is any
24 relationship. And by then, the four hours
25 drive, I believe her fear is just, okay,

1 Yvette Wang
2 Miles Kwok is the biggest dissident of
3 Chinese government. And she doesn't want to
4 get together with those group of people. I
5 mean, Miles Kwok's group of people. And then
6 I don't think that fear or that experience is
7 related to this project.

8 Let me tell you why. Because when
9 this project show up in front of me, my first
10 reaction is, okay, what is job of this lady?
11 And later on, with more meetings together
12 with them, I was educated, Ms. Wallop and
13 Mike, they are super very much experienced in
14 investigation and research, which they
15 described themselves in front of me. And
16 from those meetings, I feel no fear, they
17 have no fear at all to, like, Miles Guo or
18 me. So it's totally separated.

19 Q. Why was the agreement, if you look
20 at Exhibit 2, it says here both parties agree
21 that the nature of this contract and work
22 related to it is highly confidential.

23 A. Yes, I saw this.

24 Q. What is your understanding of that
25 phrase?

1 Yvette Wang

2 A. Highly confidential, both parties,
3 what is my understanding? My understanding
4 is that all the information related to this
5 project or this contract, should be kept
6 confidential.

7 Q. And at whose request was that?

8 A. I believe, this is my guess, again,
9 because when I have the draft, it's -- if my
10 memory works well, it's already there. So my
11 guess is, this is a request from both sides.

12 Q. And do you know why both sides
13 wanted it that way?

14 A. I don't know, but I feel this is a
15 common sense.

16 MR. SCHMIT: If I can have this
17 marked as Exhibit 6.

18 (Whereupon, at this time, the
19 reporter marked the above-mentioned
20 three-page letter as Wang Exhibit 6
21 for identification.)

22 BY MR. SCHMIT:

23 Q. Ms. Wang, I'm going to hand you
24 what's been marked as deposition Exhibit 6.

25 A. Thank you.

1 Yvette Wang

2 Q. It's a three-page letter, dated

3 February 23rd, 2018.

4 Do you have that in front of you?

5 A. Yes.

6 Q. Have you ever seen this before?

7 A. Yes, I did.

8 Q. Did you look at it, just a yes or no

9 to this, did you look at it in draft form?

10 A. I'm sorry, what is your question?

11 Q. Did you see it in draft form?

12 A. Draft form meaning?

13 Q. Prior to being executed.

14 A. Yes, I did, I did.

15 Q. Did you provide any input into it?

16 A. Yes, I did.

17 Q. Who else would have provided input

18 into this letter?

19 A. Who else provided information to

20 this, right?

21 Q. Yes.

22 MR. GRENDI: Objection. You

23 can answer.

24 A. Mr. Guo.

25 Q. Anybody else?

1 Yvette Wang

2 A. My lawyer.

3 Q. And just, if -- when you say my
4 lawyer, who are you referring to?

5 A. Foley Hoag, H-O-A-G, people.

6 Q. Did they represent Eastern Profit in
7 connection with the negotiation of the
8 agreement as well?

9 A. One of their partner, they did.

10 Q. Who was that?

11 A. Gare, G-A-R-E, Smith.

12 Q. So Mr. Smith would have looked at
13 the agreement that we've marked as Exhibit 2
14 prior to Eastern Profit executing it?

15 MR. GRENDI: Objection. You
16 can answer.

17 A. Far before this version. You know
18 what I mean?

19 Q. No, I don't.

20 A. Okay. So the very, very, very
21 beginning, when I first time visited Ms.
22 Wallop to discuss about this contract.

23 Q. Was there a draft on the table or
24 did you discuss concepts?

25 A. I asked him to --

1 Yvette Wang

2 MR. GRENDI: Objection, stop,

3 hold on. I don't want you to

4 reveal --

5 MR. SCHMIT: Just yes or no,

6 sorry.

7 MR. GRENDI: I just want to

8 instruct the witness on this.

9 Don't reveal any conversations

10 you had with any lawyers.

11 THE WITNESS: Okay.

12 MR. GRENDI: Why don't we just

13 roll that back and you can ask yes or

14 no, please?

15 MR. SCHMIT: Can you just

16 repeat it?

17 (Whereupon, at this time, the requested

18 portion was read by the reporter.)

19 A. Yes.

20 Q. And was Ms. Wallop present for this

21 meeting?

22 A. No.

23 Q. Who else -- was anybody else in the

24 room when you discussed this?

25 A. No.

1 Yvette Wang

2 Q. Was Mr. Guo or anybody on the phone?

3 A. No.

4 Q. If you look at -- it's the third

5 paragraph of the letter. It says, Eastern

6 agreed to delay the start of the contract by

7 ten days from January 6th to January 16th.

8 Do you see that?

9 A. Yes.

10 Q. And January 6th is the day the

11 contract was executed, right?

12 A. Correct.

13 Q. Is that true?

14 A. Correct, that was -- that is true.

15 Q. Why was that done?

16 A. You mean the delay?

17 Q. Yes.

18 A. Oh, that was on January 26th. The

19 last meeting was Wallop, Mike, Guo and me

20 together at New York. By that meeting, Mike

21 and Ms. Wallop finally presented their report

22 to Mr. Guo and me, which they already delayed

23 about like three weeks -- three weeks.

24 Q. I'm sorry, what day was this

25 meeting?

1 Yvette Wang

2 A. January 26th. And by that meeting,
3 Mike and Ms. Wallop apologized many times to
4 Mr. Guo and me, saying they had internal
5 communication problem, misunderstanding
6 between Mike and their project manager about
7 the report, and about the delay. So they
8 officially apologized many, many times.

9 Q. At that meeting?

10 A. Yes. And then they offered to Mr.
11 Guo and me, saying that because of our
12 mistake and our internal communication
13 problem with my project manager, and we offer
14 this ten days to you. So that was the ten
15 days came from.

16 Q. And simply that would mean less
17 would be due under the contract?

18 MR. GRENDI: Objection. You
19 can answer.

20 A. Sorry, I don't understand.

21 Q. That would mean less money would be
22 due under the contract, right?

23 MR. GRENDI: Same objection, go
24 ahead.

25 A. In my understanding, that means the

1 Yvette Wang
2 date we paid. I mean, the one month we paid
3 should start from January 16th instead of
4 January 6th.

5 Q. And what was the purpose of this
6 letter that we've marked as Exhibit 6?

7 A. The purpose was to terminate,
8 officially terminate the contract, and to
9 advise Strategic Vision return the deposit,
10 otherwise Eastern is going to take legal
11 action.

12 Q. So this was the official termination
13 notice of the agreement, right?

14 MR. GRENDI: Objection. You
15 can answer.

16 A. Correct.

17 Q. Why did Eastern Profit believe it
18 was entitled to receive the million dollar
19 deposit back?

20 MR. GRENDI: Objection. You
21 can answer.

22 MR. SCHMIT: What could
23 possibly be the objection to that
24 question?

25 MR. GRENDI: Go ahead.

1 Yvette Wang

2 A. Because Eastern believes or Mr. Guo

3 believes they are cheated and Strategic

4 Vision, they are liar and they did fraud to

5 the client.

6 Q. Who is the client in that statement?

7 MS. TESKE: Object.

8 A. Eastern Profit Corporation Limited,

9 the client in this contract (indicating).

10 Q. Specifically, why was Eastern Profit

11 terminating this contract, as opposed to

12 trying to work it out or move forward with

13 the agreement?

14 A. Why? In my understanding, because

15 after the January 26th meeting, remember,

16 that was the last meeting for four of us get

17 together --

18 Q. That was January -- give the exact

19 date?

20 A. January 26th.

21 Q. January 26, 2018?

22 A. No. No, January 26th.

23 Q. What year?

24 A. 2018.

25 Q. Okay. Continue.

1 Yvette Wang

2 A. And from that meeting first,
3 Strategic Vision admitted they made mistake,
4 they apologized, and they delivered nothing
5 and with a delay date. After that, I
6 believe --

7 Q. Could I just ask, what do you mean
8 by delay date?

9 A. You remember in the contract, the
10 first month they should deliver weekly
11 report. That never ever happened.

12 Q. And the delay date, is that a
13 reference from January 6th to January 16th?

14 A. Yes, yes. Not only that.

15 Q. What else, go ahead?

16 A. Because as long as January 6th the
17 contract signed, and they should start to
18 deliver the weekly report. That never
19 happened. And then by January 26th, finally,
20 there was a, which I, by the way, I do not
21 have the copy. They just briefly, very
22 quickly, show us, apologized, and then they
23 took them away.

24 Q. Have you personally reviewed any of
25 the reports or flash drives that were

1 Yvette Wang

2 provided by Strategic Vision to Eastern

3 Profit under the contract?

4 A. Yes, I did.

5 Q. Which ones?

6 A. The one on January 26th.

7 Q. Any others?

8 A. The second one and the last one, I
9 don't know that's called report or not. The

10 so-called 80 gigabyte data.

11 Q. When was that provided?

12 A. 1/30 or 1/31. I don't remember that
13 clearly. You can check that date.

14 Q. Did you review anything that was
15 provided by Strategic Vision prior to January
16 26th?

17 A. Nothing.

18 Q. What is your understanding as to
19 whether anything had been provided under the
20 agreement?

21 A. Sorry, what is the question?

22 Q. What is your understanding as to
23 whether anything had been provided under the
24 agreement?

25 A. Oh, okay. My understanding, under

1 Yvette Wang

2 the agreement, they should provide weekly
3 report in first month, which they didn't.

4 Q. Did they provide anything, though?

5 A. Nothing.

6 Q. Nothing, as far as you know, nothing
7 was given to any representative of Eastern
8 Profit prior to the January 26th meeting?

9 A. You are 100 percent right.

10 Q. And what was presented at the
11 January 26th meeting, as far as form or
12 substance?

13 A. Mike and Ms. Wallop brought a, they
14 called virgin laptop. It's a Lenovo, I
15 remember. And they said, their report can
16 only be presented on virgin laptop, never
17 connect with any internet. So they brought
18 that laptop together with a flash drive,
19 which is encrypted. There's a keyboard on
20 the flash drive. So they presented the
21 report with those devices.

22 Do you want to know the content of
23 the report?

24 Q. Yes.

25 A. Okay. So it's all based on my

1 Yvette Wang
2 memory. So they didn't, by the way, they
3 didn't leave any copy or any copy of that
4 report to us. So I remember that was about
5 like ten or a dozen -- 10 or 12 pages of a
6 PDF, word -- a PDF file. But mainly about
7 like the documents which we provided to them.
8 Like, for example, the fish, like they just
9 repeat, like open this file for this fish.
10 But there is nothing in there. Something
11 like that. It's really very blurry my
12 memory.

13 Because during that presentation, I
14 remember Mike was sweating a lot, a lot. And
15 he was very nervous. And Ms. Wallop and Mike
16 both were repeatedly apologized, saying they
17 have internal communication problem with
18 their project manager. So by the way, that
19 presentation was conducted by Mike.

20 So I was sitting aside, I don't
21 remember, or standing behind them, just very
22 quickly went through the screen, laptop
23 screen. So my memory is not that clear. But
24 basically, there is nothing like valuable.

25 Q. What did you tell Mike and Ms.

1 Yvette Wang

2 Wallop at that meeting on January 26th?

3 A. You mean me?

4 Q. You or Mr. Guo. Was anybody else
5 there?

6 A. No, just the four of us. We told
7 them clearly, we are very extremely
8 disappointed. And we told them first the
9 seriously delay, the timeline which agreed
10 and signed in the contract, and we gave them
11 enough time, and they didn't even start it.
12 And we are very disappointed, and we cannot
13 accept that at all.

14 Q. Anything else?

15 A. And then they keep apologizing and
16 they said they have their team working, which
17 they didn't say who, of course, and where.
18 And they said they will go to meet their
19 project manager in person to pick up their
20 raw material, which is about like 60
21 gigabyte.

22 And then we were extremely
23 disappointed, and we said, whatever you have,
24 just bring that to me. See whether there is
25 something, again, like garbage today or

1 Yvette Wang

2 something which is meaningful or valuable.

3 Q. Did you say anything about the
4 contract or payment or termination, anything
5 along those lines?

6 A. You mean on January 26th?

7 Q. Yes.

8 A. No, not yet.

9 Q. And when you say -- you say project
10 manager, did they ever identify who the
11 project manager was?

12 A. Who identified?

13 Q. You've used the term a couple of
14 times their project manager, their project
15 manager and miscommunication?

16 A. Yes.

17 Q. Did Mr. Waller or Ms. Wallop ever
18 say who their project manager was?

19 A. You mean their project manager?

20 Q. Yes.

21 A. No, they didn't. But it sounds like
22 that project manager resides somewhere not in
23 the U.S., Europe somewhere.

24 Q. What about, were there any
25 communications between Eastern Profit and

1 Yvette Wang

2 Strategic Vision between the January 26th

3 meeting and the January 31st delivery?

4 MR. GRENDI: Objection. You

5 can answer.

6 A. Between Eastern and Strategic

7 Vision, you mean?

8 Q. Yes.

9 A. No, I don't believe so.

10 Q. So you never communicated with --

11 you or Mr. Guo to your knowledge, never

12 communicated in between those two meetings?

13 A. Between January 26th to when?

14 January 31st?

15 Q. January 31st.

16 A. Why January 31st?

17 Q. I think that's when you identified

18 the next delivery was made. Am I right about

19 that? If I'm wrong --

20 A. Should be February 6th, after they

21 offer this ten day. It should be like

22 February somehow. But we did communicate, I

23 believe.

24 Q. What was the nature of those

25 communications?

1 Yvette Wang

2 A. Who you mean, right?

3 Q. What was the nature of the
4 communications?

5 A. The nature of the communication was
6 we basically asked them stop going around,
7 let's talk about the project. And your fault
8 or your mistake is your problem. And we have
9 been patient enough and given you enough
10 time. And we are very disappointed and we
11 are asking whether they are real capable of
12 doing this project or not.

13 Q. So this was in --

14 MR. GRENDI: Objection.

15 Actually, not objection, I just want
16 to point out we're over 1 o'clock. I
17 don't know where this line of
18 questioning, if you want to wrap it
19 up or if you want to break now.

20 MR. SCHMIT: It's up to you. I
21 probably have ten more minutes on
22 this topic, but we can break now.

23 THE WITNESS: I'm with you.

24 Ten more minutes.

25 BY MR. SCHMIT:

1 Yvette Wang

2 Q. After January 26th, what was the
3 next deliverable or meeting you had with
4 either Ms. Wallop or Mr. Waller?

5 MR. GRENDI: Objection. You
6 can answer.

7 A. You mean deliverable meeting dates
8 requested based on the contract or which is
9 real --

10 Q. The next time you saw him. The next
11 time you met with him or spoke with them to
12 get something from them?

13 A. That is the so-called 60 or 80
14 gigabyte. I don't remember that.

15 Q. How was that delivered?

16 A. That happened in Penn Station.
17 Track Bar, there's a bar in there.

18 Q. About when was that? Was that the
19 January 31st or the February 6th date?

20 A. I don't remember that. But you can
21 check from my Signal message. It should be
22 very end, 30th or 31st of January. I don't
23 remember, but you can check that from my
24 records. So that is after the January 26th
25 meeting. And then Mike and Ms. Wallop said,

1 Yvette Wang

2 Mike was going to fly to their project
3 manager to meet him face to face and to pick
4 up the flash drive and fly back right away to
5 deliver to us. And then we give them one
6 more chance. And --

7 Q. When did you give them that one more
8 chance?

9 A. When you mean?

10 Q. Yes, when.

11 A. 26th.

12 Q. Okay. Continue.

13 A. And then I remember Mike started to
14 text me directly. Because before that, I
15 only directly Signal text to Ms. Wallop. So
16 Mike text me, told me where should I go and
17 when. He said, Union Station, Track Bar.
18 And it's late afternoon, like five or
19 something p.m. And then I went there. And
20 that was the date and place he gave me that
21 second flash drive with that like 80 or 60
22 gigabyte things.

23 Q. Did you personally review that flash
24 drive?

25 A. You mean in the Union Station?

1 Yvette Wang

2 Q. No, at all, ever.

3 A. I did.

4 Q. You did?

5 A. Uh-huh.

6 Q. Where did you do that?

7 A. I went back to meet Mr. Guo because

8 he was quite waiting for that. So I came

9 back from the station.

10 Q. On the same day?

11 A. The same day, right away. Right

12 away.

13 Q. And you're sure which day was this,

14 you say?

15 A. I don't remember that date. Please

16 check, they are there. And we were together,

17 went through that flash drive.

18 Q. Had you been given any instructions

19 about what to look for on that flash drive?

20 A. No.

21 Q. So Mr. Waller and Ms. Wallop didn't

22 ask you at all, you know, this is what you

23 should look for, this is what's in there?

24 A. No, they didn't say anything.

25 Q. Was there anything going on at the

1 Yvette Wang

2 time that Eastern Profit needed that

3 information at that time?

4 A. I'm sorry, I don't understand your

5 question.

6 Q. Did Eastern Profit miss anything or

7 breach a contract or not be able to do

8 anything because it didn't have the

9 information on the 26th or whatever the

10 subsequent date is?

11 MR. GRENDI: Objection. You

12 can answer.

13 A. I don't remember clearly. But I did

14 remember like Mr. Guo, he was waiting for

15 that information for his plan.

16 Q. Why was he waiting for that

17 information?

18 A. Why?

19 Q. Yes.

20 A. Because he needs that information.

21 Q. To do what?

22 A. To do his tech now, Chinese

23 Communist party work.

24 MS. TESKE: Objection.

25 A. He has been doing for last two,

1 Yvette Wang

2 three years.

3 Q. How is he going to use that
4 information in order to do that?

5 MS. TESKE: Object.

6 MR. GRENDI: Objection.

7 A. I don't know.

8 Q. You never asked?

9 A. No.

10 MR. SCHMIT: Why don't we break
11 for lunch now?

12 (Whereupon, a luncheon recess
13 was taken.)

14 BY MR. SCHMIT:

15 Q. Welcome back, Ms. Wang.

16 A. Thank you.

17 Q. Just remember you're still under
18 oath.

19 A. Yes.

20 Q. After the termination letter that we
21 looked at a short while ago was sent, what,
22 if anything, did Eastern Profit do to carry
23 on the prong as we've referred to it as?

24 A. Ask Foley Hoag to follow up.

25 Q. That's not what I'm asking. Did the

1 Yvette Wang
2 research continue, did you have somebody else
3 continue to research individuals?

4 A. I have no idea. I don't know.

5 Q. You've not been involved in any
6 research or investigation projects since
7 Foley Hoag sent this letter?

8 A. Correct.

9 Q. Do you know who Rich Higgens is?

10 A. Rich?

11 Q. Rich Higgens?

12 A. Sorry, who is this person?

13 Q. That's the question. Do you know
14 who that person is, Rich Higgens?

15 A. Rich Higgens, sounds -- the name is
16 familiar. Is it the guy with DOJ? Is that
17 the guy? No, I don't know.

18 Q. Who were you thinking of just now?

19 A. Because there was a newspaper talk,
20 there is a DOJ employee was sued before,
21 maybe I was wrong. Something similar like
22 that one.

23 MR. GRENDI: Can you give me a
24 spelling on Higgens?

25 MR. SCHMIT: H-I-G-G-E-N-S. It

1 Yvette Wang

2 might be I-N-S, I'm not sure.

3 Q. You don't recognize that name? As
4 far as you know, Eastern Profit doesn't work
5 with him?

6 A. No.

7 Q. Has Eastern Profit done anything to
8 retain some other firm or individual to do
9 the research it wanted strategic alliance to
10 do -- or Strategic Vision, excuse me?

11 A. I don't know.

12 Q. Not to your knowledge?

13 A. Not with my knowledge.

14 Q. Do you know who William Yu, Y-U, is?

15 A. No, I don't know.

16 Q. You never met anybody by that name?

17 A. William Yu, no, never.

18 Q. To your knowledge, is Mr. Guo
19 carrying on the work we've been discussing in
20 any way, shape or form since Strategic Vision
21 was terminated?

22 MR. GRENDI: Objection. You
23 can answer.

24 A. I don't know.

25 Q. You have not been involved?

1 Yvette Wang

2 A. No.

3 MS. TESKE: Same objection.

4 MR. SCHMIT: Let's mark this as
5 Exhibit 7.

6 (Whereupon, at this time, the
7 reporter marked the above-mentioned
8 bank document as Wang Exhibit 7 for
9 identification.)

10 BY MR. SCHMIT:

11 Q. I'm handing you what's been marked
12 for your deposition as Exhibit 7. Do you
13 have that in front of you?

14 A. Yes.

15 Q. It's got the production numbers in
16 the lower right-hand corner of Eastern, a
17 bunch of zeros, 21 through 22.

18 Do you see that?

19 A. Yes.

20 Q. Do you recognize this document?

21 A. Yes.

22 Q. What is it?

23 A. It's bank document.

24 Q. Do you know what it is conveying or
25 signifying?

1 Yvette Wang

2 A. This shows a transaction with

3 beneficiary name, Strategic Vision.

4 Q. Have you ever seen this document

5 before?

6 (Witness peruses document.)

7 A. Yes, I did.

8 Q. What is it?

9 A. Huh?

10 Q. What is it?

11 A. It's a bank proof document.

12 Q. Proving what?

13 A. Proving looks like a wire transfer
14 to Strategic Vision. Happened on January 2,
15 2018.

16 Q. Who is sending the wire?

17 A. ACA Capital Group Limited.

18 Q. And do you know why ACA Capital
19 Group Limited is sending a wire to Strategic
20 Vision?

21 A. From this project, that this should
22 be the deposit. Because the time match,
23 looks like.

24 MR. SCHMIT: Can we just have
25 this marked as 8, please.

1 Yvette Wang

2 (Whereupon, at this time, the
3 reporter marked the above-mentioned
4 corporate telegraphic transfer
5 cancellation amendment request as
6 Wang Exhibit 8 for identification.)

7 BY MR. SCHMIT:

8 Q. I'm going to hand you what's been
9 marked for your deposition, ma'am, as Exhibit
10 8.

11 A. Thank you.

12 Q. Eastern 279 to 280.

13 A. Yes.

14 Q. Have you ever seen this before?

15 A. Yes.

16 Q. What is it?

17 A. It's a corporate telegraphic
18 transfer cancellation amendment request.

19 Q. Who is making the request?

20 A. Looks like ACA Capital Group
21 Limited.

22 Q. And, again, do you know why they're
23 making this request?

24 A. I guess from the date, it looks like
25 they tried to cancel the wire.

1 Yvette Wang

2 Q. To your knowledge, did anybody from
3 Eastern Profit or anyone for that matter,
4 tell Strategic Vision, Hey, we're going to
5 try to cancel the wire we sent?

6 A. I have no knowledge about that.

7 Q. You didn't do it?

8 A. No, I didn't.

9 Q. And again, you weren't involved in
10 any conversations regarding why the wire was
11 canceled?

12 A. I'm sorry, what is the question?

13 Q. You weren't involved in any
14 conversations concerning why the wire was
15 canceled; is that a correct statement?

16 A. I was not involved in any
17 conversation of that.

18 Q. And looking at this doesn't refresh
19 your recollection of anything?

20 A. No, no.

21 MR. SCHMIT: Mark this as 9,
22 please.

23 (Whereupon, at this time, the
24 reporter marked the above-mentioned
25 e-mail chain as Wang Exhibit 9 for

1 Yvette Wang

2 identification.)

3 BY MR. SCHMIT:

4 Q. I'm going to hand you what's been
5 marked as Exhibit 9 for your deposition. It
6 is 276 through 278.

7 Do you have that in front of you?

8 A. Yes.

9 Q. Do you recognize the document?

10 A. Yes.

11 Q. Where have you seen it before?

12 A. Together with these two, Exhibit 8
13 and 7. 7, 8, 9, they were together.

14 Q. This is talking about the million
15 dollars deposit again, right, Exhibit 9?

16 A. Yes.

17 Q. Who are these people, Serena Hon,
18 who is that?

19 A. It looks from here, she is a
20 director finance of ACA Capital Group
21 Limited.

22 Q. Have you ever met her?

23 A. No.

24 Q. How about the recipient of the
25 e-mail, Jamie Yi Jing, Y-I, J-I-N-G?

1 Yvette Wang

2 A. From the following e-mail, this is
3 the -- this is a person from institutional
4 banking group, DBS Bank Limited.

5 Q. Have you ever spoken with that
6 individual?

7 A. No.

8 Q. You don't know them?

9 A. No, I don't know.

10 Q. How about the two people that were
11 copied, Stacy Wai Shi, W-A-I, S-H-I?

12 A. From the e-mail, Stacy Wai Shi still
13 has a DBS dot com e-mail. So I assume this
14 is DBS Bank people.

15 Q. And have you ever spoken with her?

16 A. No.

17 Q. And how about the last person there?

18 A. The same answer.

19 Q. You don't know them?

20 A. I don't know them.

21 Q. So you didn't have any discussions
22 about attempting to pull back the million
23 dollar deposit?

24 A. Sorry, no.

25 Q. And Mr. Guo, he never told you why

1 Yvette Wang

2 it was being pulled back or attempted to be

3 pulled back?

4 MR. GRENDI: Objection. You

5 can answer.

6 A. You mean ever he told me or the

7 reason?

8 Q. Did he ever tell you?

9 MS. TESKE: Object.

10 Q. You can answer.

11 A. No.

12 Q. And you didn't, though, discuss the

13 reasoning for trying to pull back that

14 deposit with anybody, just so the record is

15 clear?

16 A. You are right. The first time I

17 heard about that is a try to retract the

18 monies from this case.

19 MR. SCHMIT: Mark this as 10,

20 please.

21 (Whereupon, at this time, the

22 reporter marked the above-mentioned

23 handwritten document as Wang Exhibit

24 10 for identification.)

25 BY MR. SCHMIT:

1 Yvette Wang

2 Q. I'm handing you what has been marked
3 as Exhibit 10.

4 A. Thank you.

5 Q. It's production number Eastern 10.

6 The question is simple, what is this?

7 A. This is the full name of Mike.

8 Q. Is that your handwriting?

9 A. No.

10 Q. Do you know whose handwriting it is?

11 A. Han, H-A-N, Lianchao.

12 Q. And who is that?

13 A. This person or Han Lianchao?

14 Q. Han Lianchao.

15 A. Who is he?

16 Q. Yes.

17 A. He is, I was told he's a friend of
18 Mike and Ms. Wallop.

19 Q. Why was this in -- do you know where
20 this was pulled from or why it was produced?

21 A. This is because Mr. Guo and me, we
22 never know Mike's full name. We don't have
23 that. He never give to us. And we just know
24 his name is Mike. And then after we entered
25 into the project, the contract over here

1 Yvette Wang
2 (indicating), we find out the full name of
3 Ms. Wallop. So obviously, we're going to
4 take legal action. So we want to know who is
5 another defendant in this potential case.

6 So we asked Han Lianchao, L.C., to
7 tell us, I remember this is his handwriting
8 on a napkin, when he was in New York, with
9 Mr. Guo and me together.

10 Q. And when was that?

11 A. What was this?

12 Q. When was it.

13 A. Oh. I don't remember that clearly.

14 Q. Approximately?

15 A. Approximately, before we filed the
16 complaint.

17 Q. So it was early February or in
18 February, 2018?

19 A. Early 2018, obviously, but I don't
20 remember. You can check the complaint date,
21 which was filed. It was before that date.

22 Q. Was it before the letter was sent,
23 the termination letter?

24 A. I don't remember clearly.

25 MR. SCHMIT: Mark this as

1 Yvette Wang

2 Exhibit 11.

3 (Whereupon, at this time, the
4 reporter marked the above-mentioned
5 complaint as Wang Exhibit 11 for
6 identification.)

7 BY MR. SCHMIT:

8 Q. I'm handing you what has been marked
9 as Exhibit 11. It is the complaint that was
10 filed in this action.

11 A. Yes.

12 Q. Do you have that in front of you?

13 A. Yes.

14 Q. Have you ever seen this document
15 before?

16 A. Yes.

17 Q. Did you provide the factual basis to
18 any of these allegations in here?

19 A. Yes, I did.

20 MR. GRENDI: I'm just going to
21 hop in and caution the witness about
22 revealing attorney-client
23 communications with this line of
24 questioning, and things of that
25 nature.

1 Yvette Wang

2 THE WITNESS: Yes.

3 Q. It says here in paragraph 30, As a
4 result of Strategic Vision's breach, Eastern
5 has suffered substantial damages.

6 What are those damages?

7 A. They had a loan, in my
8 understanding. They have their legal cost.
9 They have their logistic cost. I believe
10 there are probably more, but that will be
11 based on strategic -- no, sorry, Eastern
12 Profit's calculation.

13 Q. What is the loan referred to, just
14 so the record is clear?

15 A. The loan between ACA Capital and
16 Eastern Profit.

17 Q. Have they paid that loan back yet?

18 A. I don't know.

19 Q. Has there been a demand letter?

20 A. I didn't receive personally.

21 Q. Have you ever heard of that having
22 taken place?

23 A. I didn't hear anything of that yet.

24 Q. Has anybody -- have you discussed --
25 was there anybody on behalf of Eastern Profit

1 Yvette Wang

2 who discussed that loan with ACA Capital

3 Limited, as far as you know?

4 A. I have no knowledge about that.

5 Q. What makes you think that Eastern

6 Profit has to pay that loan back?

7 A. This is common sense. You borrow

8 money, you have to pay back.

9 Q. Has ACA Capital actually asked for

10 that money to be paid back?

11 A. I don't know.

12 Q. And how did you gain an

13 understanding that they had actually given

14 the money or they had a promise from Eastern

15 Profits to actually repay that money?

16 A. Because I was told this is a loan.

17 And then common sense, you borrow money, you

18 have to pay back, right?

19 Q. Well, I'm looking for a little bit

20 more than common sense. You're the 30(b)(6)

21 witness here today.

22 A. I am.

23 Q. So what is Eastern Profit's basis

24 for saying that that loan has caused -- that

25 that loan is the basis of damages caused by

1 Yvette Wang

2 Strategic Vision?

3 A. Oh, that is my guess.

4 Q. That is your guess?

5 A. Yes. That is my guess and my
6 thoughts. So that's why I said the damages
7 should be based on Eastern Profit, their
8 calculation.

9 Q. Has anybody, as an Eastern Profit's
10 representative here today, done a calculation
11 as to what their damages might be?

12 A. I didn't.

13 Q. Did Eastern Profit ever tell
14 Strategic Vision that there was a loan
15 throughout?

16 A. I didn't. From myself, I didn't,
17 but I don't know other people whether tell
18 anyone something.

19 Q. Did Eastern Profit ever explain to
20 Strategic Vision in any way, shape or form
21 why ACA Capital was wiring money to Strategic
22 Vision?

23 MR. GRENDI: Objection. You
24 can answer.

25 A. When I was on behalf of Eastern to

1 Yvette Wang

2 handle this project, from me, no, I didn't.

3 Q. Are you aware of anybody else having
4 done so?

5 A. I have no knowledge about that.

6 Q. Did Ms. Wallop or Mr. Waller ever
7 ask you why this money showed up from ACA
8 Capital Limited?

9 A. No. They never ever mentioned
10 anything about that one million at all.

11 Q. They never mentioned it at all?

12 A. Never.

13 Q. So money showed up to Strategic
14 Vision from an entity, a million dollars, and
15 nobody came back to you guys and said, Hey,
16 why is this showing up in our bank account in
17 this fashion?

18 A. You are correct.

19 Q. How about at the execution of the
20 agreement on January 6th, was there any
21 discussion whatsoever about the million
22 dollar deposit?

23 A. To be honest with you, that was
24 quite a surprise to me. Because they never
25 ever mentioned anything about that one

1 Yvette Wang

2 million U.S. dollars. That was why I was a
3 little bit surprised.

4 Q. Well, did you mention it to them?

5 Did you ask about it?

6 A. Of course, I text her.

7 Q. When did that happen?

8 A. That happened on one -- no, January
9 2nd, January 2nd.

10 Q. And you never got a response, it was
11 never raised at the January 6th meeting?

12 A. No.

13 Q. You didn't --

14 A. Zero word about that one million.

15 Q. What did you expect them to ask you?

16 A. I didn't expect anything.

17 Q. Well, the impression you're giving
18 is you thought it was odd?

19 MR. GRENDI: Objection.

20 Q. That it wasn't raised, so I'm just
21 wondering, were you expecting them to say
22 something, were you expecting a question,
23 what was that?

24 A. That's right. Because someone wire
25 you one million without any contract or any

1 Yvette Wang
2 agreement, and the money came to your
3 account, at least you should say that, Oh,
4 there's one million on my account, right?
5 And with the contract we didn't sign yet, are
6 we going to do this project or not?

7 As a courtesy or it's a common sense
8 that if, for example, if that big amount of
9 money show on our, anyone people in here,
10 personal account, you gonna be shocked,
11 because I will have a huge fear, what is
12 this?

13 But the weird thing is that neither
14 Ms. Wallop and Strategic Vision, nor Mike,
15 they mention nothing about this one million
16 at all, from the beginning until the end.

17 Q. Did they ever ask for the one
18 million dollars to be paid again?

19 A. Pay again?

20 Q. Yes.

21 A. In my knowledge, no.

22 Q. How about, do you know if Mr. Guo
23 ever had a conversation? Did he ever say
24 anything about it?

25 A. About what?

1 Yvette Wang

2 MR. GRENDI: Objection.

3 Q. The million dollar deposit.

4 MR. GRENDI: Objection.

5 A. About million dollars, yes.

6 Q. What did he tell you about that?

7 A. He send me the wire receipt, asking

8 me to contact Ms. Wallop with my text

9 message, Signal text message in there. And

10 generally said, if we continue to do this

11 project, and you -- this is my term, you have

12 to agree with me. Otherwise, please, if we

13 don't do this project anymore, please return

14 the one million and sorry for the

15 inconvenience.

16 Besides that, before that, and I

17 remember I text this one million deposit went

18 out with the contract not signed yet, it's an

19 unexpected situation with a contract, but at

20 same time, the payment went out with, you

21 know, the technical, just when you send out,

22 you cannot just pull it back.

23 So I remember I said, this is

24 showing the seriousness, again, from our

25 side. If you check my Signal message, you

1 Yvette Wang

2 should be able to see it.

3 Q. How did you expect them to react,
4 though, that's what I'm trying to get?

5 A. Reaction?

6 Q. Yes. When you told them it was
7 coming, you told them it was from you?

8 A. From me?

9 Q. From Eastern Profit?

10 A. Yes, from our side, yes. I was
11 expecting neither she probably talked to her
12 people to return the fund, because there's
13 really no -- there was really no contract
14 signed by then. Or she probably will agree
15 with my draft of the contract.

16 Q. And did you present a contract to
17 her at that point?

18 A. I did.

19 Q. What day was that?

20 A. That was, if you check, that was
21 January 2nd. January 1st or January 2nd.
22 January 2nd. Yes, January 2nd. That was, I
23 went to Virginia to her house to discuss
24 about the contract draft. And I was
25 supposed -- my plan or our plan is to sign

1 Yvette Wang

2 that contract before new year.

3 So from 1/1, January 1st, this
4 project can kick off. But Mr. Wallop and me,
5 we had like a very long meeting, hours
6 meeting, in a Saturday and Sunday, before new
7 year, two afternoon. And we were back
8 forward, back forward, discuss about
9 waterline, discuss about waterline, discuss
10 about like fish, and we didn't get agreement.

11 So we didn't sign the contract. So by then,
12 I already give her the contract. She didn't
13 agree with that. So that's why.

14 Q. She didn't agree with the draft you
15 had handed her?

16 A. Correct, correct. So I had to leave
17 Washington D.C., because I have my schedule
18 on Monday, that was a Sunday. So I left -- I
19 was supposed to sign on contract with her by
20 that day, but I didn't.

21 So that's why I kind of, like, I
22 didn't finish that project or that contract.
23 I had to left -- I had to leave. But later
24 on, I realized and Mr. Guo told me, he was
25 expecting me to sign the contract together,

1 Yvette Wang
2 finalize the contract. And same time
3 simultaneously, it looks like he already
4 arranged the payment. So by the end, payment
5 hit your account, but contract didn't sign.

6 Q. And then that draft is a marked up,
7 changed version of that draft is what was
8 brought to the January 6th meeting?

9 MR. GRENDI: Objection. You
10 can answer.

11 A. No. By January 6th meeting, the
12 final version which is in front of you, this
13 is still not my draft. Ms. Wallop revised
14 again.

15 Q. But did she revise the draft you had
16 handed her at the pre New Year's meeting?

17 A. That's right.

18 Q. And the changes she made are the
19 ones you stated earlier, right?

20 A. Correct. The recapping, yes.

21 Q. Then you ultimately decided to sign
22 that version of the agreement, correct?

23 A. You mean on January 6th?

24 Q. Yes.

25 A. You remember, I said I called Mr.

1 Yvette Wang

2 Guo. I told him, this is still not my
3 contract, but I can see there's recap here,
4 right, this is new, and then what do you want
5 me to do. And then he said, Then just sign
6 it. Then I sign it.

7 Q. Just yes or no to this. Was
8 Mr. Smith involved at this stage of the
9 proceedings, Gare Smith who you identified
10 earlier?

11 A. I know Gare Smith; you mean
12 preceding these proceeding?

13 Q. No. During these negotiations
14 you're talking?

15 A. With Ms. Wallop, right?

16 Q. Was Gare Smith?

17 A. Yes.

18 Q. Was he involved in any of these
19 meetings or looking at the drafts or helping
20 you out in any fashion?

21 A. No.

22 Q. When was the last time you would
23 have spoken or conferred with him?

24 A. I don't remember that clearly.
25 Sometime late December. I don't remember

1 Yvette Wang

2 that clearly.

3 Q. But at some point he looked at a
4 draft and you discussed it with him? Don't
5 tell me what you discussed.

6 A. Yes.

7 Q. If you could just look at the
8 fraudulent misrepresentation count there.
9 Page 6.

10 (Witness peruses document.)

11 A. Yes.

12 Q. It says there, if you look at
13 paragraph 32, Prior to entering into the
14 contract representatives for Strategic Vision
15 made the following representations to
16 Eastern.

17 Do you see that?

18 A. Yes.

19 Q. Who were the representatives of
20 Strategic Vision referring to?

21 A. Ms. French Wallop and Mr. J. Michael
22 Waller.

23 Q. Now, you know, it says, A, Strategic
24 Vision had a highly skilled in-house team of
25 investigators ready to conduct the detailed

1 Yvette Wang
2 research Eastern required during a short
3 timeframe.

4 Do you see that?

5 A. Yes.

6 Q. When did they -- is that a
7 representation that was made to you?

8 A. Made to me?

9 Q. Yes.

10 A. I don't understand the question.
11 Made to me with what?

12 Q. Did somebody say that to you?

13 A. Yes.

14 Q. Who said that?

15 A. Strategic Vision.

16 Q. Who is Strategic Vision?

17 A. Ms. French Wallop and Mr. J. Michael
18 Waller.

19 Q. Who said those words, though; who
20 made those representations to you?

21 A. Both of them.

22 Q. On separate occasions, at the same
23 time?

24 A. At the same time. At the same time.

25 Q. When was that made?

1 Yvette Wang

2 A. Well, a couple of times.

3 Q. When was the first time that
4 representation was made?

5 A. I remember the first time should
6 be -- first time which I was there is like
7 mid December, something like that, almost
8 every, each meeting about this project, and
9 the Strategic Vision that two person, and
10 they always repeatedly, repeatedly tell or
11 told Mr. Guo and me, they are this, very
12 capable, very experienced.

13 Q. The best?

14 A. Yes. The best in the industry.

15 Q. Specifically, with respect to, A,
16 highly skilled in-house team of
17 investigators.

18 Do you see that?

19 A. Yes.

20 Q. What words did they use to convey
21 that?

22 A. What words? They said they have
23 project manager, they have different team in
24 different kind of, like, country, and they
25 have quite a lot of significant clients who

1 Yvette Wang
2 they served and they named them as a
3 reference. But they refused to tell us,
4 like, what position in their team, like those
5 kind of details.

6 Q. So they identified clients for you?

7 A. Yes.

8 Q. Who were the clients they
9 identified?

10 A. Some Russian official, Middle
11 Eastern royal family people. I believe you
12 have the names. Handwriting by Ms. Wallop,
13 yeah.

14 Q. Did you attempt to contact them or
15 verify those stories at all?

16 A. No, I didn't, personally, I didn't.

17 Q. Did Mr. Guo?

18 A. I don't know.

19 Q. Did anybody else, as far as you
20 know?

21 A. No idea.

22 Q. Did you and Mr. Guo or anybody else
23 ever talk about these clients and the work
24 Strategic Vision had done for them or
25 anything along those lines?

1 Yvette Wang

2 A. Personally, I didn't.

3 Q. Did you ever ask Mr. Waller or Ms.

4 Wallop, you know, more about their team or

5 how they would do it or what they wanted to

6 do?

7 A. We mentioned, we asked, yes.

8 Q. What did they say?

9 A. They refused to tell too much

10 details. They just say they are very

11 capable. And they use for the clients, and

12 they are experienced, but I don't know who

13 they are or where are they.

14 Q. But they told you they weren't going

15 to tell you, right? I mean, you asked and

16 they said, We're not going to reveal that

17 information?

18 MR. GRENDI: Objection. You

19 can answer.

20 A. We did not ask the name. And they

21 didn't disclosure too much details.

22 Q. Did you ask them for more detail?

23 A. I don't remember that. I don't

24 remember that part.

25 Q. Did they specifically say in-house?

1 Yvette Wang

2 When you use the term in-house, is that a
3 word that came out of Ms. Wallop's or Mr.
4 Waller's mouth?

5 A. I believe this is described their
6 project manager.

7 Q. It says here, they said highly
8 skilled in-house team. I'm just wondering,
9 did they ever actually use the term in-house?
10 Did you ever discuss with them what they
11 meant by in-house?

12 A. The in-house means their people.
13 They always called them our people.

14 Q. So they said -- that's what I'm
15 trying to get. I want to know what they
16 said. Did they say our people?

17 A. Yes. So in my understanding, okay,
18 your people, it's your team. And it should
19 be in-house, not you --

20 Q. Well, did they ever say in-house,
21 though? That's the question.

22 A. They said my people, our people.

23 Q. Our people, my people?

24 A. Yes.

25 Q. Something along those lines but

1 Yvette Wang

2 never used the words in-house?

3 A. I don't remember that.

4 Q. How about, B, why don't you read
5 that to yourself.

6 (Witness peruses document.)

7 A. Yes.

8 Q. Did a representation about former
9 intelligence officers, was that ever
10 discussed in your presence?

11 A. You mean, is there any formal
12 intelligence officer shows in front of me?

13 Q. No, no. You had discussions, I
14 assume, it says Strategic Vision here in the
15 complaint. This is the complaint filed by
16 Eastern Profit.

17 A. Oh, okay.

18 Q. Did somebody from Strategic Vision
19 ever specifically say they had a former
20 intelligence officer or anything like that?

21 A. Yes, they did.

22 Q. And when would those representations
23 have been made?

24 A. Many times. Almost every -- each of
25 the meetings about this project.

1 Yvette Wang

2 Q. Did you ask them what they meant by
3 that?

4 A. What is your question?

5 Q. Did you ask them what they meant by
6 a former intelligence officer?

7 A. What does that mean?

8 Q. Did you ask them what they meant
9 when they said former intelligence officer?

10 A. We ask, like who they are, what did
11 they work for, like for previous -- like
12 their employer or their experience. And
13 basically we didn't ask too much, but we did
14 ask. Mainly they, I mean, Ms. Wallop and
15 Mike, they voluntarily kept talking with us.
16 Keep introducing us many, many times. And
17 even I can feel clearly by the end of some
18 meeting, we start to lose our patience, like,
19 let's stop education, let's talk about the
20 contract and project.

21 Q. So at a certain point you got sick
22 of hearing about their capabilities and what
23 they can do?

24 A. What is the question?

25 MR. GRENDI: Objection.

1 Yvette Wang

2 Q. At a certain point you got tired of
3 hearing about their capabilities and what
4 they can do?

5 A. Yes. Because they are repeating so
6 many, many times.

7 Q. And you just said, Let's get to the
8 contract and let's negotiate it?

9 A. No. We said, Let's just see what we
10 can do together, not specifically which
11 contract or which investigation.

12 Q. At the end of the day, was it really
13 important to you whether there was a former
14 intelligence officer involved or not?

15 A. That is their team. And we have no
16 control about that team.

17 Q. What did you -- the capabilities of
18 conducting sophisticated financial tracking,
19 do you remember many conversations about
20 that?

21 A. Yes.

22 Q. What was said about that?

23 A. Like they said they are capable of
24 climb the wall and watch the thing right
25 there. Like, sounds like they are breaking

1 Yvette Wang

2 something.

3 Q. Breaking something?

4 A. They described that. Yes.

5 Q. When you look at sophisticated

6 financial tracking, what would your

7 expectation be?

8 A. Legal.

9 Q. Legal versus nonlegal?

10 A. Yes. Because what they said to us

11 is not legal. It's common sense, we don't

12 need that.

13 Q. What did they say to you?

14 A. They said climb the wall and see the

15 assets. So in our understanding, it's not

16 legal.

17 Q. So at that point you didn't really

18 rely on that, in fact, you told them, We

19 don't want that; is that a stair statement?

20 MR. GRENDI: Objection.

21 Objection.

22 You can answer.

23 A. What is your question?

24 Q. At that point, when you heard that

25 from Ms. Wallop or Mr. Waller, you said, No,

1 Yvette Wang

2 we don't want that?

3 A. Correct, correct.

4 Q. You don't have to do that, right?

5 A. Correct.

6 MR. GRENDI: Objection. I'm

7 just going to advise you to please

8 not raise your voice at the witness.

9 I think -- I know you're trying to

10 get information.

11 MR. SCHMIT: I'm not raising my

12 voice at all. I think the record

13 will reflect --

14 MR. GRENDI: Well, I think --

15 MR. SCHMIT: It's been going a

16 little clearer now that we're getting

17 a better understanding, but I don't

18 think I've been raising my voice at

19 all.

20 THE WITNESS: By the way, I

21 don't like people have their cell

22 phone in front of me like this. It

23 just makes me uncomfortable. So that

24 will slow down my answer to you. I'm

25 just trying to help here.

1 Yvette Wang

2 MR. SCHMIT: What's your cell

3 phone preference?

4 THE WITNESS: If you look

5 around at some cell phones are like

6 this to me (indicating). So I don't

7 like that.

8 MR. SCHMIT: Well, you focus on

9 me. I'm asking the questions.

10 THE WITNESS: That's right. So

11 help me to focus on you.

12 BY MR. SCHMIT:

13 Q. Okay. With respect to that climb

14 over the wall, what do you mean by that? I'm

15 not sure I follow that.

16 A. Ms. Wallop means that climb the

17 wall, she said that is kind of like a

18 description for their breaking some bank

19 system, like that way. That is her

20 description.

21 Q. And what is your -- and it's

22 about -- what is your basis for saying what

23 she described was illegal?

24 A. At least don't breaking the bank

25 system. Nobody asked you to do that, right?

1 Yvette Wang

2 Q. Did you investigate -- did you
3 follow up and find out exactly what had
4 happened?

5 MR. GRENDI: Objection. You
6 can answer.

7 A. What happened?

8 Q. Like, by climb the wall.

9 A. Climb the wall?

10 Q. Yes. Did they show you a screen
11 shot? Did they show you a password? What
12 happened?

13 A. No, no, they didn't.

14 Q. So she said they climbed the wall
15 and looked in at the bank?

16 A. Yes, sounds like that.

17 Q. And that's an analogy to doing
18 something electronically, right?

19 A. Right.

20 Q. They're not physically climbing a
21 wall?

22 A. You are right.

23 Q. Did you investigate the various
24 country's laws to what was described to you,
25 what was legal versus illegal?

1 Yvette Wang

2 A. No. We didn't research, because

3 this is not what we want at all.

4 Q. You didn't want it at all. But you

5 couldn't tell me one way or another whether

6 it was legal or illegal in any given country

7 that was involved in this contract; is that a

8 fair statement?

9 MR. GRENDI: Objection. You

10 can answer.

11 A. What is your question?

12 Q. You can't tell me one way or another

13 that what was described to you in any given

14 country was legal or illegal?

15 A. I think that that kind of action in

16 any country is not legal, right, common

17 sense.

18 Q. What do you base that on?

19 A. Common sense.

20 Q. Just common sense?

21 A. My common sense. Sorry, I'm not

22 professional, but common sense.

23 Q. But then again, you made it clear

24 prior to executing the contract, that that's

25 not what you wanted, right?

1 Yvette Wang

2 A. I'm confused by your question.

3 Q. You made it clear prior to executing
4 the contract, whatever it is, climbing over
5 the wall, that's not what you wanted them to
6 do?

7 A. No.

8 Q. And so any representations about
9 climbing the wall or doing that kind of
10 activity weren't relevant to the contract
11 that was being executed?

12 MR. GRENDI: Objection. You
13 can answer.

14 A. Everything said in the contract, we
15 request as legitimate, legal, in any other
16 place. So when I heard about climbing the
17 wall that thing is not in our expectation and
18 we were shocked, and we refused.

19 Q. What did you tell Mr. Guo about
20 that?

21 A. About what?

22 Q. Climbing the wall. What was his
23 reaction?

24 A. He was in the meeting.

25 Q. What did he say? Did you talk about

1 Yvette Wang

2 it afterwards?

3 A. He said, No, no, no, no.

4 Q. Wasn't it Mr. Guo that asked whether
5 you could access money from banks of these
6 people you were identifying?

7 MS. TESKE: Object.

8 A. What is your question?

9 Q. Didn't Mr. Guo ask representatives
10 from Strategic Vision whether they could
11 access money from the bank accounts of the
12 people that were being identified by Eastern
13 Profit?

14 MS. TESKE: Object.

15 MR. GRENDI: Same objection.

16 A. I don't remember that.

17 Q. You don't remember that happening at
18 all?

19 A. No.

20 Q. Let's go on to page 7. C there,
21 they had represented other sophisticated
22 clients in the past, including Republican
23 politicians, a Middle Eastern prince, and a
24 leader of the Russian Opposition Party. Do
25 you see that?

1 Yvette Wang

2 A. Yes.

3 Q. And that -- when was that

4 representation made?

5 A. I forget the time. In one of the

6 meetings about this project.

7 Q. And did you follow up with any of

8 these individuals to even verify that they

9 were clients?

10 A. Follow up? You mean?

11 Q. Call them, e-mail them, text them?

12 A. I didn't.

13 Q. Did anybody at your direction?

14 A. From me, I didn't.

15 Q. Do you know of it being done at all?

16 A. I have no idea.

17 Q. Do you have any reason to believe

18 that this is not a true statement, that they

19 represented sophisticated clients in the

20 past? What about that --

21 A. Personally, I believe that is true.

22 Q. You do believe that is a true

23 statement?

24 A. Yes.

25 Q. Okay.

1 Yvette Wang

2 A. Because otherwise why Ms. Wallop
3 handwrite all the client's name? I mean,
4 some of the very important client's name in
5 Miles Guo's handbook -- notebook.

6 Q. You have no reason to believe that
7 it wasn't true, right?

8 MR. GRENDI: Objection. You
9 can answer.

10 A. Personally, I believe it's true.

11 Q. And do you believe some of those
12 clients might have included Republican
13 politicians?

14 A. I don't know about that.

15 Q. Do you have any reason to believe
16 they didn't?

17 A. I have no knowledge about that.

18 Q. Do you know whether Ms. Wallop is a
19 Republican or a Democrat?

20 A. It's not my business. I never know
21 about that.

22 Q. How about Middle Eastern princes?

23 A. Yes.

24 Q. Any reason to think the clients in
25 the past didn't include a Middle Eastern

1 Yvette Wang

2 prince?

3 A. It should be on the handwriting,
4 some of them.

5 Q. You believed it to be true?

6 A. I believe the handwriting, it's
7 true.

8 Q. And do you have any reason to
9 believe that what was written on that sheet
10 of paper, napkin whatever you're describing
11 wasn't true?

12 A. Which paper?

13 Q. Wherever the prince's name was
14 written down. My question is, do you have
15 any reason to believe that that prince was
16 not a former client of Strategic Vision or
17 Ms. Wallop or Mr. Waller?

18 A. After I saw Ms. Wallop, her
19 handwriting on Mr. Guo's notebook, I believe
20 they are true.

21 Q. And a leader of the Russian
22 Opposition Party, do you have any reason to
23 believe that Strategic Vision didn't
24 represent a leader of the Russian Opposition
25 Party?

1 Yvette Wang

2 A. Same answer.

3 Q. You believed them to be true?

4 A. Yes.

5 Q. Have you discovered anything since
6 then to in any way make you question that?

7 A. Same answer like before, no.

8 Q. Paragraph 34, it says here,
9 Strategic Vision also told Eastern that
10 Eastern's one million dollar deposit would be
11 used as a deposit against the last payments
12 owed by Eastern at the end of the contract.
13 Paragraph, upon information and belief
14 Strategic Vision also knew this statement to
15 be false.

16 Why was that statement false?

17 A. I don't understand this statement.
18 Can you please help me?

19 Q. It's Eastern Profit's complaint.
20 That's the one million dollar deposit under
21 the agreement.

22 A. That's right, this is drafted by
23 lawyer. English is not my first language,
24 sorry about that. I'm trying to understand.

25 Q. Was that representation ever made to

1 Yvette Wang

2 you?

3 (Witness peruses document.)

4 A. From the contract side --

5 Q. So you're referring back to the
6 contract that's been marked. What exhibit is
7 that for the record?

8 A. Your Exhibit number 2.

9 Q. Okay.

10 A. Page number 5. The client will pay
11 the contractor a deposit of U.S. dollar one
12 million upon signing the contract. The
13 deposit will be credited on a prorated basis
14 to the final one to one-third month of the
15 contract.

16 In my understanding, this one
17 million should not be used against the last
18 payment.

19 Q. Should not be used?

20 A. Correct.

21 Q. What should have happened with the
22 one million dollar deposit upon --

23 A. This is, in my understanding, an
24 evergreen deposit, which means that one
25 million just stay there as one million. And

1 Yvette Wang

2 they, Strategic Vision is going to issue
3 invoice every month and the client is just to
4 pay the invoice.

5 Q. So it would stand out there, and the
6 client, you would still owe the monthly fees?

7 MR. GRENDI: Objection. You
8 could answer.

9 Q. That's what evergreen means, right?

10 A. Correct, yes.

11 Q. In other words, to give you an
12 example, you paid a million dollars and you
13 get that bill for \$750,000. If the million
14 dollars is an evergreen deposit, or in our
15 business a retainer, you still have to pay
16 that \$750,000, right?

17 A. That is evergreen, you are right.
18 Pay month by month and this deposit stay
19 there.

20 Q. What happens to that evergreen
21 deposit at the end of the contract?

22 A. They didn't say clearly in the
23 contract, which means Strategic Vision should
24 return that deposit after this project is
25 terminated.

1 Yvette Wang

2 Q. Well, it says here, the deposit will
3 be credited on a prorated basis to the final
4 one and one-third months of the contract. Do
5 you see that?

6 A. Yes.

7 Q. What is your understanding of that?

8 A. Can I say, I don't understand what
9 is prorated basis? I don't understand this.

10 Q. You don't know what prorated -- you
11 don't have a view as to what prorated basis
12 means?

13 A. I'm not quite familiar with that.

14 Q. What language of this contract would
15 say that Strategic Vision should just return
16 the million dollars at the end of the
17 contract?

18 A. They didn't clearly say that
19 sentence in the contract.

20 Q. It's not in there, right?

21 A. Correct.

22 Q. When was the final day of the
23 contract?

24 MR. GRENDI: Objection. You
25 can answer.

1 Yvette Wang

2 A. Final day?

3 Q. You sent a letter on February 23rd,

4 but if you look at the last sentence, I'll

5 just point it out to you, it discusses 30

6 days written notice.

7 Do you see that?

8 A. Yes.

9 Q. So what's the final day of the

10 contract?

11 MR. GRENDI: Just objection. I

12 think the letter speaks for itself,

13 but she can answer.

14 A. This is really a mathematic

15 question.

16 Q. Okay.

17 A. I mean, anyone can calculate.

18 Q. Calculate from when, what numbers?

19 A. From the letter.

20 Q. Okay.

21 A. From the letter of Foley Hoag. And

22 we, based on the contract, gave them 30 days

23 notice time.

24 Q. Beginning on February 23rd?

25 MR. GRENDI: Same objection.

1 Yvette Wang

2 A. Why February 23rd?

3 Q. Isn't that the date of the letter?

4 A. That's right.

5 Q. What does the contract say?

6 A. One month notice time.

7 Q. So it would be one month after

8 February 23rd, correct?

9 A. Yes.

10 MR. GRENDI: Objection.

11 Q. Did -- and I think you answered this
12 this morning, I just want to make sure. Did
13 Eastern Profit pay, other than the deposit,
14 did they pay any money to Strategic Vision?

15 A. No.

16 MR. GRENDI: Let's just -- can
17 we take a break for two minutes?

18 MR. SCHMIT: Sure.

19 (Whereupon, a brief recess was
20 taken.)

21 BY MR. SCHMIT:

22 Q. We're back on the record.

23 A. Yes.

24 Q. We were talking how the million
25 dollar deposit would be used, paragraph 34 of

1 Yvette Wang
2 the complaint. And you were comparing it to
3 the language in the contract marked as
4 Exhibit 2.

5 Now, I think in the end you had just
6 said that other than the million dollar
7 deposit, Eastern Profit had made no other
8 payments to Strategic Vision; is that
9 correct?

10 A. Correct.

11 Q. So under those circumstances, let's
12 just assume for a second you guys had no
13 complaints, but had given a termination
14 notice. How would that million dollar
15 deposit be used?

16 MR. GRENDI: Objection.

17 Q. In other words, the contract went
18 fine, and you just decided to terminate it
19 for reasons unrelated, and we've got that
20 million dollar deposit. What are we supposed
21 to do with it?

22 MR. GRENDI: Objection. You
23 can answer.

24 A. You mean, what is our expectation to
25 Strategic Vision about that one million,

1 Yvette Wang

2 right?

3 Q. Yes.

4 A. They should return.

5 Q. Even if the contract -- if the

6 contract had been performed and you had made

7 no other payments for the three-month period,

8 they would just return the million dollars?

9 A. Correct.

10 Q. What is that based on? What

11 language of the contract is that based on?

12 A. Because that one million was wired

13 and hit Strategic Vision's account without a

14 contract signed. This is a financial or

15 understanding mistake. Even with the

16 contract signed, that million should be

17 returned back and after the contract signed

18 and wired again. That is a professional

19 proper financial procedure.

20 Q. Did anybody ever ask, until this

21 lawsuit or, excuse me, until the Foley Hoag

22 letter for the million dollars to be

23 returned?

24 A. Yes, we did.

25 Q. You asked them? When did you ask?

1 Yvette Wang

2 A. Yes. January 2nd, you see my text
3 message. I said please return.

4 Q. No, no, after the contract was
5 signed. No additional money was paid by
6 Eastern Profit. Did you really expect them
7 to then pay back the money and then have it
8 paid again? Did you ever convey that to
9 anybody from Strategic Vision?

10 A. Me, I didn't.

11 Q. Did somebody? Did anybody?

12 A. I don't know.

13 Q. Then why would you expect them to
14 give it back after the contract had been
15 signed and they were owed a million dollars?

16 A. Because this is a financial
17 procedure.

18 Q. Based on what?

19 A. Based on no money can be paid
20 without a confirmed signed contract.

21 Q. Says who?

22 MR. GRENDI: Objection.

23 MR. SCHMIT: Well, I mean, it's
24 a fair question. This is kind of a
25 million dollars at stake in the case

1 Yvette Wang

2 and she's the 30(b)(6) witness.

3 MR. GRENDI: I understand that,

4 but it is getting to the point of

5 argumentative. But proceed.

6 Q. You can continue.

7 A. What is your two questions before?

8 I mean, what is your original question?

9 Q. My question is, originally, let's

10 just eliminate the ACA Capital and the timing

11 of the payment. The contract essentially

12 goes for three months, Eastern Profit, after

13 execution pays Strategic Vision a million

14 dollars. No other payments are made. But

15 everyone agrees that Strategic Vision is owed

16 for three months of work. What should happen

17 with that million dollars?

18 MR. GRENDI: Objection. You

19 can answer.

20 A. I still don't understand your

21 question.

22 Q. How much money under the contract --

23 you're here to testify about the contract?

24 A. I am.

25 Q. If Strategic Vision performed as you

1 Yvette Wang
2 wanted under the contract, and they worked
3 for three months, how much money would they
4 be owed?

5 A. Zero, because they deliver nothing.

6 Q. No, no.

7 MR. GRENDI: Hold on, let's go
8 off the record here a second. We
9 must be having a language --

10 MR. SCHMIT: No, no, I don't
11 want to go off the record.

12 MR. GRENDI: What do you want
13 to say here? We're clearly having an
14 issue with understanding.

15 MR. SCHMIT: Let's just
16 continue. I'm perfectly fine
17 continuing.

18 MR. GRENDI: Go ahead.

19 BY MR. SCHMIT:

20 Q. I'm talking about -- we're going to
21 assume for the sake of argument, because
22 we're not going to agree on whether there was
23 performance under the contract, right?

24 A. Correct.

25 Q. So what I want to know is, let's

1 Yvette Wang

2 assume that you were happy with what

3 Strategic Vision had done?

4 A. Okay.

5 Q. Yet, you issued a termination notice

6 for reasons unrelated to performance under

7 the contract. What, for three months of

8 work, would Strategic Vision be owed?

9 A. You're asking a mathematic question.

10 Q. That's what I'm asking, if that's

11 what you think it is.

12 A. Then 750,000, three months, you can

13 have three of them.

14 Q. Okay. So 750,000 times three,

15 essentially?

16 A. That is said in this contract, based

17 on where is the deliverable report.

18 Q. That's fine. We're assuming you're

19 okay with that. Let's assume 750,000 wasn't

20 paid each month and all that was sitting

21 there was the million dollars. What would

22 happen with that million dollars under the

23 scenario I laid out for you?

24 A. Can you repeat your question again?

25 Q. What would happen -- basically,

1 Yvette Wang

2 Strategic Vision is owed 750,000 times three,
3 we've agreed, right?

4 A. Go ahead.

5 Q. We've agreed, so far --

6 A. This is said in the contract, the
7 words in the contract.

8 Q. Yes, exactly. They're owed that
9 money, but the only money that's been given
10 to them by Eastern Profit is the million
11 dollar deposit. Under that scenario, what
12 should we do with the million dollar deposit?

13 A. Should be refunded.

14 Q. Why?

15 A. Because there is no performance in
16 here at all.

17 Q. No, we're assuming performance was
18 okay. It's a hypothetical. Are you familiar
19 with that term?

20 A. No.

21 Q. Okay. We're just setting up -- I'm
22 eliminating, for the sake of argument, the
23 whole point of this question is you agree
24 with performance. You think Strategic Vision
25 did a great job, I know you didn't, okay. I

1 Yvette Wang
2 know you don't. But let's assume that they
3 did a great job, they worked for three
4 months. All they were paid was a million
5 dollar deposit. In other words, even though
6 they did great work, you didn't pay them for
7 the three months, you didn't pay the 750,000
8 or the 750,000 for February, the 750,000 for
9 the part of March. Okay? Are you with me so
10 far?

11 A. Kind of.

12 Q. Okay. What should happen at that
13 point with the million dollar deposit?

14 A. Back to your Exhibit number 2.

15 Q. Okay.

16 A. Yes, right here, your Exhibit number
17 2, page number 5. The deposit will be
18 credited on a prorated basis to the final one
19 to one-third month of the contract. They can
20 use the deposit.

21 Q. To pay what's owed?

22 A. This is said in the contract. If I
23 may --

24 MR. GRENDI: Hold on, wait for
25 questions.

1 Yvette Wang

2 MR. SCHMIT: Off the record for

3 a second.

4 MR. GRENDI: Sure.

5 (Discussion held off the

6 record.)

7 Q. I'm going to hand you, Ms. Wang, an

8 exhibit -- excuse me, we're not going to mark

9 it as an exhibit but it has production

10 numbers SVUS 000171 through 000259.

11 MR. GRENDI: Wait, can we go

12 off the record again? I'm sorry.

13 MR. SCHMIT: Okay.

14 (Discussion held off the

15 record.)

16 MR. SCHMIT: Okay, let's mark

17 it as an exhibit.

18 (Whereupon, at this time, the

19 reporter marked the above-mentioned

20 name list as Wang Exhibit 12 for

21 identification.)

22 BY MR. SCHMIT:

23 Q. I'm going to hand you what has been

24 marked as Exhibit 12 for your deposition.

25 A. Thank you.

1 Yvette Wang

2 Q. Just flip through it and let me know
3 when you're finished. It has production
4 numbers SVUS 000171 through 000259. And
5 that's marked confidential and should remain
6 confidential.

7 Have you ever seen this document
8 before?

9 A. Yes.

10 Q. What is it?

11 A. They are the name list.

12 Q. Where did it come from?

13 A. Mr. Guo.

14 Q. Where did Mr. Guo get it?

15 A. I don't know.

16 Q. Did you ever talk to him about it?

17 A. No.

18 MS. TESKE: I object to this
19 whole line of questioning. Because I
20 haven't seen the document, and I also
21 don't think I can read the document.

22 MR. GRENDI: Well, if you
23 want --

24 MS. TESKE: To the extent it
25 concerns my client and I haven't had

1 Yvette Wang
2 a chance to review it, I object to
3 this line of questioning. This is
4 not my client so I'm not going to
5 direct her not to answer, but I would
6 like to put my objection on the
7 record.

8 BY MR. SCHMIT:

9 Q. Whose handwriting -- if you can look
10 at page 5, 175 production number, page 5 in
11 handwriting, whose handwriting is that?

12 A. I don't know.

13 Q. Same question for 177, page 7.

14 A. I don't know.

15 Q. Did Mr. Guo ever tell you where he
16 got this list or this packet?

17 MR. GRENDI: Objection. You
18 can answer.

19 A. No.

20 Q. Did you ever ask?

21 A. No.

22 Q. When did you see it before?

23 A. I don't remember that clearly. It
24 should be December 2017.

25 Q. At some point during the month of

1 Yvette Wang

2 December of 2017?

3 A. Correct.

4 Q. Who was -- was it just you and

5 Mr. Guo?

6 A. Correct.

7 Q. Ms. Wallop and Mr. Waller weren't at
8 that meeting?

9 A. No.

10 Q. What did he tell you? Did he tell
11 you to do anything with this document?

12 A. He said this is about this project.

13 Q. And did he instruct you to do
14 anything with it?

15 A. Go to talk, discuss about the
16 contract, if signed please deliver this to
17 Strategic Vision.

18 Q. And you ended up delivering this to
19 Strategic Vision?

20 A. Correct.

21 Q. Did you ever hear Mr. Guo say that
22 he had paid \$250 million for this document,
23 and the information within it?

24 A. Can you repeat?

25 MS. TESKE: Object.

1 Yvette Wang

2 Q. Did you ever hear Mr. Guo tell
3 anybody that he had paid \$250 million for the
4 information in this document?

5 A. I didn't hear that from myself, by
6 myself.

7 Q. Did you ever hear anybody else say
8 that or --

9 A. I don't remember.

10 Q. It doesn't sound familiar at all?

11 A. No.

12 Q. You never heard him represent that
13 to Ms. Wallop or Mr. Waller?

14 A. I don't remember that.

15 Q. Remember as in it didn't happen or
16 you're not sure one way or another?

17 A. I just don't remember whether that
18 happened or not. No memory about that.

19 Q. Did you ever discuss how he gathered
20 the names or the information?

21 A. No.

22 MR. SCHMIT: Mark this as 13.

23 (Whereupon, at this time, the
24 reporter marked the above-mentioned
25 background report as Wang Exhibit 13

1 Yvette Wang

2 for identification.)

3 BY MR. SCHMIT:

4 Q. I will hand you what was marked as

5 Exhibit 13.

6 (Witness peruses document.)

7 Q. It is a background report with the

8 production number Eastern 144 through 195.

9 A. Yes.

10 Q. Can you just let me know when you're

11 finished reviewing?

12 A. Yes, you can go ahead.

13 Q. Have you ever seen this before?

14 A. Yes.

15 Q. What is it?

16 A. This is the one file in the 80

17 gigabyte.

18 Q. So about -- we're not sure what day

19 you received the 80 gigabyte, though, right?

20 A. You remember Penn Station, Track

21 Bar? That's the date I received the 80

22 gigabyte.

23 Q. Is this a report Strategic Vision

24 had within the 80 gigabytes?

25 A. Correct.

1 Yvette Wang

2 Q. Is this one of the individuals you
3 identified?

4 A. This is not.

5 Q. It's not?

6 A. Not.

7 Q. Who is it?

8 A. I don't know.

9 Q. But this is a Strategic Vision
10 report, as far as you know?

11 A. Correct.

12 Q. How do you know, off the top of your
13 head, that this isn't somebody that was
14 identified to Strategic Vision?

15 A. I'm sorry, what's the question?

16 Q. How do you know, just looking at it,
17 that this is not somebody that was actually
18 identified to be researched?

19 A. Oh, from the photo and the date of
20 birth (indicating). They are totally
21 different people.

22 Q. They are different, okay.

23 Did you remember this individual for
24 some reason?

25 A. I don't remember.

1 Yvette Wang

2 Q. You looked very quickly back to
3 Exhibit 12 and found him.

4 A. Because it's a Mandarin name. It's
5 easy for me to read and check and find.

6 MR. SCHMIT: Can we have this
7 marked as 14?

8 (Whereupon, at this time, the
9 reporter marked the above-mentioned
10 background report as Wang Exhibit 14
11 for identification.)

12 BY MR. SCHMIT:

13 Q. I will hand you what has been marked
14 as Exhibit 14.

15 A. Thank you.

16 (Witness peruses document.)

17 Q. You've been handed 14, it's Eastern
18 23 --

19 A. Yes.

20 Q. -- through 143. Do you recognize
21 this?

22 A. Yes.

23 Q. Is this from the 80 gigabytes as
24 well?

25 A. Correct.

1 Yvette Wang

2 Q. Is this somebody that you were asked
3 to research?

4 A. No.

5 Q. No? Which one is that?

6 A. (Indicating).

7 Q. What are you holding up?

8 A. (Indicating).

9 Q. Okay.

10 A. Completely different people.

11 Q. Were there -- did you raise this
12 with Strategic Vision?

13 A. We did.

14 Q. What did they say about these two
15 people?

16 A. They didn't reply. They didn't
17 comment.

18 Q. They didn't say -- did you get a
19 phone call or an e-mail or a text? How did
20 you do it?

21 A. By text message.

22 Q. And you never got a response to
23 that? Did you specifically point out, Hey,
24 these two are the wrong ones?

25 MR. GRENDI: Objection.

1 Yvette Wang

2 A. That's right. I don't remember
3 that. Correction, I don't remember that.

4 Q. You don't know if you said, Hey,
5 these two individuals are --

6 A. We didn't specifically say these two
7 individuals. We text them, told them, this
8 is garbage. Which means, the whole 80
9 gigabyte, they are all garbage, similar, like
10 this situation. Same name, but totally
11 different people.

12 Q. Are there any other examples you can
13 tell me off the top of your head?

14 A. I don't remember that clearly. 80
15 gigabyte is a lot.

16 Q. And you weren't given any
17 instructions or qualifiers about what to
18 expect in the 80 gigabytes?

19 A. What is your question, sorry?

20 Q. Were you given any instructions on
21 like where to look within the 80 gigabytes or
22 what to expect or what was going to be in
23 them?

24 A. On the Exhibit 12, that said clearly
25 on the page, it says, A, financial research,

1 Yvette Wang

2 B, tracking research. That is the request.

3 Q. No, no. I'm asking you whether Mr.
4 Waller or Ms. Wallop provided you with any
5 guidance as to -- or qualifiers as to what
6 was within the 80 gigabytes you were given?

7 A. They didn't.

8 Q. Who were these two people that --
9 was there any missed opportunity that you
10 needed this information right away?

11 A. Correct.

12 Q. For what?

13 A. I heard Mr. Guo, he has his plan, as
14 whistle blower work plan. And this delay and
15 garbage destroyed it.

16 Q. How did it destroy it?

17 A. Because all of them, they are
18 garbage.

19 Q. But the delay though, was it time
20 sensitive? What was going to happen?

21 A. Oh, before Chinese New Year, last
22 Chinese New Year, which is February 14th,
23 15th, I heard he had planned by Chinese New
24 Year, he's waiting for the information.

25 Q. What plan?

1 Yvette Wang

2 A. I did not ask him further.

3 Q. And which bits of information did he
4 need?

5 A. He didn't specifically say which
6 one.

7 Q. You have no idea what the plan was
8 to be executed by the Chinese New Year?

9 A. I have no idea.

10 Q. And was it some of the information
11 or he needed all of the information? What
12 was needed in order to execute this plan?

13 MS. TESKE: Objection.

14 A. The first two months' reports, which
15 is a weekly report plus preliminary report,
16 because the whole January, you know, the
17 reports of January, yes.

18 Q. He needed those for the plan?

19 A. Yes.

20 MS. TESKE: Objection.

21 Q. Why?

22 A. I have no idea.

23 Q. Why do you say he needed that?

24 A. He told you.

25 Q. Did he specify it or he just said

1 Yvette Wang

2 generally, I need the reports, I need the

3 reports? What was he saying to you?

4 A. I don't remember the details. And I

5 didn't ask, but he told me, he got a plan.

6 Q. And so this information that was

7 coming in to Eastern Profit was necessary for

8 a plan?

9 MR. GRENDI: Objection. You

10 can answer.

11 A. Correct.

12 Q. But you don't know what that plan

13 is?

14 A. I have no idea.

15 Q. I mean, can you -- any of this

16 information that was requested, do you have

17 any idea of how it was going to be used?

18 A. I don't know.

19 MR. SCHMIT: Mark this as 15,

20 please.

21 (Whereupon, at this time, the

22 reporter marked the above-mentioned

23 screen shot of text messages as Wang

24 Exhibit 15 for identification.)

25 BY MR. SCHMIT:

1 Yvette Wang

2 Q. Ms. Wang, I'm going to hand you what

3 has been marked as Exhibit 15.

4 A. Thank you.

5 Q. It is a series of text messages,

6 bearing production numbers Eastern 2081?

7 A. Yes.

8 Q. -- through 213.

9 A. Yes.

10 Q. Do you have that in front of you?

11 A. Yes.

12 Q. It says French at the top. Who is

13 that referring to?

14 A. French Wallop.

15 Q. Okay. And do you know, can you

16 tell, is this a text that you were involved

17 in?

18 A. Correct.

19 Q. Okay. Are you the -- and are you

20 the shaded box or the lighter box?

21 A. I'm this color box, the dark color

22 box.

23 Q. The top one, okay.

24 A. Yes.

25 Q. It says here, Hi, both L and M

1 Yvette Wang

2 advised me that we supposed to meet again.

3 Do you see that?

4 A. Yes.

5 Q. And that was on January 5th?

6 A. Correct.

7 Q. Who is L and M?

8 A. Lianchao and Mr. Guo.

9 Q. Why were you supposed to meet

10 Ms. French again?

11 A. Because we didn't finalize and sign
12 the contract by the end of December in order
13 to kick off the project from January 1st.

14 Then I went back to New York and before
15 January 15th, I was told that I should go
16 back to Virginia or Washington D.C., to meet
17 Ms. Wallop and renegotiate the contract.

18 Q. Renegotiate the contract? What do
19 you mean by that?

20 A. Because the contract wasn't signed.
21 And there should be more negotiation and
22 discussion.

23 Q. About what?

24 A. Waterline.

25 Q. Did you go to that meeting with a

1 Yvette Wang

2 specific proposal?

3 A. Yes, I went.

4 Q. And what was the message Mr. Guo and

5 Lianchao wanted you to convey?

6 A. Mr. Guo told me Lianchao was

7 contacted by Wallop, and then they had some

8 talk, and then Lianchao convinced Ms. Wallop,

9 said that she was going to agree with my

10 contract, my draft. So by then, I mean, now

11 I can go back to Washington to finish this

12 contract.

13 Q. Did Mr. Guo or Lianchao explain,

14 like, what had been agreed to?

15 A. No. They didn't explain the

16 details. But they said they convinced --

17 Lianchao convinced Ms. Wallop to agree with

18 my last version of draft.

19 Q. So there was a version at this point

20 on January 5th, that was the one you would

21 have given towards the end of the year?

22 A. Yes.

23 Q. Did Ms. French ever say she had

24 spoken with Lianchao and come to an

25 agreement?

1 Yvette Wang

2 A. You mean did Ms. Wallop tell me?

3 Q. Yes.

4 A. No.

5 Q. This is if you look at January 5th,
6 it's 211 of the exhibit, production number
7 211.

8 Do you see that?

9 A. Yes.

10 Q. That statement, she's still talking
11 about the waterline in the fish tank, right?

12 A. Correct.

13 Q. And she mentions the recap?

14 A. Yes.

15 Q. She mentioned on the next page, 212,
16 We have discussed this and agreed to this
17 formula from the beginning with your boss,
18 that we remained flexible with his additions.

19 Do you see that?

20 A. Yes.

21 Q. Do you know who she's talking about
22 when she says your boss?

23 A. I believe she refers to Mr. Guo.

24 Q. And what formula is she referring
25 to?

1 Yvette Wang

2 A. I believe this formula means the
3 definition about waterline.

4 Q. So this is before the January 6th
5 signing, though, right?

6 A. Yes.

7 Q. Then you say, Can you please send
8 the contract here?

9 A. Yes.

10 Q. Was it your understanding at that
11 point that some changes had been made?

12 A. That's right.

13 Q. Then it says, there is, of course,
14 no impasse here, that's you, right?

15 A. Correct.

16 Q. Then, I work with several people, M
17 is one of them, he is not the only boss. Who
18 is M again?

19 A. My other clients.

20 Q. Who is M?

21 A. M, oh, Mr. Guo.

22 Q. And who are the other people you're
23 working with on this project? Who does that
24 refer to?

25 A. On this project, no.

1 Yvette Wang

2 Q. So, I work with several people,
3 that's just a reference to other clients?

4 A. Correct.

5 Q. And other clients of whom?

6 MR. GRENDI: Objection.

7 A. I cannot disclosure that.

8 Q. No, no. I'm asking, other clients
9 of New York Golden Spring?

10 A. Correct.

11 MR. SCHMIT: Mark this as 16.

12 (Whereupon, at this time, the
13 reporter marked the above-mentioned
14 screen shot of text messages as Wang
15 Exhibit 16 for identification.)

16 BY MR. SCHMIT:

17 Q. I'm going to hand you what's been
18 marked as Exhibit 16.

19 A. Thank you.

20 Q. Eastern 214 through 219. Do you
21 have that in front of you?

22 A. Yes.

23 Q. If you can just take a moment and
24 let me know.

25 (Witness peruses document.)

1 Yvette Wang

2 A. Yes, I finished.

3 Q. At the top it says, that's you in
4 the first box there, So I'm luckily the sole
5 communicator on behalf of all of them; do you
6 see that?

7 A. Yes.

8 Q. Who is all of them?

9 A. Lianchao and Mr. Guo.

10 Q. So all of them just refers to two
11 individuals?

12 A. That's right.

13 Q. You see the term investors
14 sometimes. Were there other investors in
15 Eastern Profits?

16 A. I don't know.

17 Q. Were there other investors on the
18 project generally that was the subject of the
19 agreement?

20 A. This project?

21 Q. Yes.

22 A. I don't know.

23 Q. Were you aware of any other
24 investors?

25 A. I have no knowledge.

1 Yvette Wang

2 Q. There could have been other
3 investors?

4 A. Could be.

5 Q. Why do you say there could be,
6 though?

7 A. I heard from Mr. Guo, because the
8 people who fighting with the regime of
9 Chinese Communist Party, they're a lot.

10 Q. And then some of those people that
11 are fighting the Communist regime could have
12 been assisting Mr. Guo with this contract and
13 this research?

14 A. Possibly.

15 MS. TESKE: Object.

16 Q. The next box down it says, Other
17 than New York, L, M, myself, I assume myself
18 is referring to French, but I thought
19 New York was a reference to Mr. Guo. But
20 then I see L and M there as well?

21 A. You are right.

22 Q. So who is M?

23 A. Mike.

24 Q. Waller?

25 A. On here it's Mike. In this blog, M

1 Yvette Wang

2 is Mike.

3 Q. Would it have been Mike as well on
4 Exhibit 15?

5 (Witness peruses document.)

6 A. No. Exhibit 15, page 208, this M is
7 Miles, Mr. Guo.

8 Q. Oh, it is. Okay.

9 A. Yes. But Exhibit number 16, page
10 214, in Wallop's message, NY, L, M, myself,
11 this M is Mike. Michael Waller.

12 Q. If you can look at 216.

13 (Witness peruses document.)

14 A. Yes.

15 Q. Is this a reference to the -- Ms.
16 Wallop's statement to the reference of this
17 time, you were driving around looking at real
18 estate?

19 A. No.

20 Q. What is it a reference to?

21 A. That was, by the end of December I
22 went to Ms. Wallop's house to discuss the
23 contract. That was my first visit to her
24 house. And then we discussed hours, hours.
25 By the end we didn't get agreement. So that

1 Yvette Wang
2 was dark. I told her I will have to take a
3 train, go back to New York. Because I have
4 my schedule on Monday. And that day was a
5 Saturday.

6 So she offered -- first she tried to
7 persuade me to stay one more day, which is
8 Sunday, to continue to discuss and finish
9 this contract. And she offered to drive me
10 to my hotel. That was the drive there. And
11 because of the four hours that drive, so this
12 was my second time in her car. I
13 automatically came to the back seat instead
14 of the front seat. So this text message
15 referring this. Because I am a guest, I have
16 to respect the owner's habit to always put me
17 in the back.

18 MR. SCHMIT: Mark this as 17,
19 please.

20 (Whereupon, at this time, the
21 reporter marked the above-mentioned
22 screen shot of text messages as Wang
23 Exhibit 17 for identification.)

24 BY MR. SCHMIT:

25 Q. Here is Exhibit 17.

1 Yvette Wang

2 A. Thank you.

3 Q. I've handed you what has been marked

4 as Exhibit 17. It is Eastern 220 through

5 222.

6 Do you have that in front of you?

7 A. Yes.

8 Q. Just let me know when you're

9 finished.

10 (Witness peruses document.)

11 A. Okay, finished.

12 Q. Do you recall this exchange?

13 A. Yes.

14 Q. Who is speaking in the first page?

15 Is that you or Ms. French?

16 A. French.

17 Q. What is she referring to? This

18 should be very concerning for your team as

19 the item is full of issues.

20 A. You mean the whole, this message

21 refer?

22 Q. Well, the part I just read to you.

23 I mean, you can read as much as you want.

24 But towards the bottom it says, This should

25 be very concerning to your team as the item

1 Yvette Wang

2 was full of issues.

3 A. The whole message here refers to the
4 USB flash drive. This message was January
5 8th. On January 6th, we sign a contract.
6 Right after sign a contract, I gave her a USB
7 drive with the information of your Exhibit
8 number 12. And she took the USB, plugged it
9 in her Mac, and click the USB and click this
10 PDF file, and open that. And me and her, we
11 went through every -- each of the page of
12 this (indicating).

13 During this process, I never touch
14 any of her devices. And then we went through
15 from bottom, top to bottom, bottom to top,
16 like a couple of minutes. I explained to
17 her, and she scrolled up, down, and she
18 admitted she received your number Exhibit 12,
19 PDF file with no problem at all.

20 And then after that, I left, I went
21 back to New York. And before this Exhibit
22 number 17 message, on page 220, and Ms.
23 Wallop called me. She said she could not
24 open the flash drive again. I have no idea
25 what happened with her device, with her

1 Yvette Wang

2 conduction of her computer.

3 So she requested to have more copy

4 of your Exhibit number 12 file. So I told

5 her, I am so busy here. I have no time to

6 take a train or flight to you. So she

7 offered to come to me to New York City. So

8 this is the message happened on your Exhibit

9 17, about this.

10 Q. So when you went first met, I guess,

11 on January 6th, you were able to open the

12 flash drive. And on whose computer was that?

13 A. Ms. Wallop's computer, yes, we were

14 able to open, go through a couple of times.

15 And there's no issue, no problem at all.

16 Q. And did you ever collect the flash

17 drive back?

18 A. The one --

19 Q. Yes. After Ms. Wallop said, Hey,

20 I'm having trouble with this, something is

21 wrong. What did she say is wrong with it?

22 A. What is your question?

23 Q. What did she say was wrong with the

24 flash drive?

25 A. She said she couldn't open. And she

1 Yvette Wang
2 tried her device. I don't remember clearly.
3 Like she tried other device as well, couldn't
4 open. I said, I cannot help you, because you
5 opened that in front of me, and you checked,
6 you admitted that you have no problem. I
7 remember, I even asked her, Did you eject the
8 USB properly, she said she did, kind of like
9 conversation like that.

10 Q. Did she ever hand it back to you,
11 the flash drive?

12 A. No.

13 Q. Have you been shown the flash drive
14 in connection with this litigation?

15 A. No.

16 Q. Were there any other problems that
17 were reported back by Strategic Vision about
18 the information that they were provided?

19 A. You mean the flash drive on January
20 6th?

21 Q. Yes. Or any other information you
22 provided, any other flash drive.

23 MR. GRENDI: Objection. You
24 can answer.

25 A. January 6th, that was the first

1 Yvette Wang
2 flash drive. She said she could not open
3 anymore. So she offered to come to me to
4 pick up more copies. And then that happened
5 on January 8th, was your Exhibit 17. And she
6 took more copies.

7 Q. Was there any other -- did anything
8 get reported back about those copies that she
9 took on the 8th?

10 A. No.

11 Q. Were there any other flash drives
12 that were delivered by Eastern Profit to
13 Strategic Vision?

14 A. You mean any other?

15 Q. Yes.

16 A. After January 8th?

17 Q. Yes.

18 A. No.

19 Q. That was it?

20 A. Correct.

21 Q. So you had delivered it on the 6th
22 and then replacements of what was delivered
23 on the 6th were delivered on the 8th?

24 A. Correct.

25 MR. SCHMIT: Mark this as 18,

1 Yvette Wang

2 please.

3 (Whereupon, at this time, the
4 reporter marked the above-mentioned
5 screen shot of text messages as Wang
6 Exhibit 18 for identification.)

7 BY MR. SCHMIT:

8 Q. I'm going to hand you what's been
9 marked as Exhibit 18.

10 A. Thank you.

11 Q. It's a series of text messages, 223
12 through 239. Take a moment and let me know
13 when you're finished.

14 (Witness peruses document.)

15 A. Yes, finished.

16 Q. Do you recognize this exchange?

17 A. Yes.

18 Q. Do you recall disputes about
19 individuals being added on for research
20 purposes?

21 A. Yes.

22 Q. What do you recall being the general
23 nature of that dispute?

24 A. It's not a dispute. It's just check
25 or ask whether still possible, if no

1 Yvette Wang

2 possible, then we didn't insist at all.

3 Q. Do you know what Ms. Wallop is
4 saying on page 2 of this, We have already
5 given you five extra this month?

6 A. Yes.

7 Q. What is she referring to there?

8 A. I remember that still related to the
9 waterline. Like, the first month totally 30
10 reports for, 15 fish, she called it fish. So
11 each fish, two reports, totally 30. And
12 after first month, should be back to ten
13 fish. But still 30 reports for A, B, C,
14 three category. So I believe this is refers
15 to that discussion.

16 Q. She says here on page 2 of the
17 exhibit, 224 --

18 A. Yes.

19 Q. In order to pull expertly, we cannot
20 be distracted with switches. Do you see
21 that?

22 A. Yes.

23 Q. It triggers all sorts of electronic
24 issues. Teams are already dispatched and
25 beginning their trip.

1 Yvette Wang

2 Do you see that?

3 A. Yes.

4 Q. Do you know what she meant by that?

5 A. Sounds like she already start to

6 work and dispatch people.

7 Q. Why would adding people late be a

8 problem because of that? Do you know?

9 A. You mean problem to her? Ms.

10 Wallop?

11 Q. Yes.

12 A. I don't understand. But from text

13 message, she said, like, electronic issues,

14 which I really don't understand.

15 Q. Did you ask?

16 A. I didn't.

17 Q. Did Mr. Guo ask, I mean, you went

18 back and said, no, they won't take the extra

19 two, right?

20 MS. TESKE: Object.

21 MR. GRENDI: Objection.

22 A. No, I didn't ask.

23 Q. He just said okay?

24 MS. TESKE: Object.

25 MR. GRENDI: Objection.

1 Yvette Wang

2 A. Correct.

3 Q. Captain, is that a reference to Mr.
4 Guo?

5 A. Captain was used by Ms. Wallop to
6 call Mr. Guo.

7 Q. How about Eastern 000233.

8 A. Yes.

9 Q. There he says in the third line or
10 you say, I think he needs to see the report
11 before January 25th, as he has some plan from
12 January 26th which will need your input.

13 Do you see that?

14 A. Yes.

15 Q. Do you know what that is referring
16 to?

17 A. I don't know the details.

18 Q. Generally, what does it refer to?

19 A. A plan of Mr. Guo and he was waiting
20 for the reports.

21 Q. Do you know what the plan was, even
22 in a general sense?

23 MR. GRENDI: Objection. You
24 can answer.

25 A. I don't know.

1 Yvette Wang

2 MR. SCHMIT: Mark this as

3 Exhibit 19.

4 (Whereupon, at this time, the

5 reporter marked the above-mentioned

6 screen shot of text messages as Wang

7 Exhibit 19 for identification.)

8 BY MR. SCHMIT:

9 Q. I will hand you what has been marked

10 for your deposition as Exhibit 19.

11 A. Yes.

12 Q. It's production number 262 through

13 264.

14 MS. TESKE: 268.

15 Q. And then 267 through 268.

16 A. Yes.

17 Q. If you read that first -- who is,

18 for the record, Pyratz?

19 A. Michael Waller.

20 Q. Is this a communication between you

21 and him or somebody else, as far as can you

22 tell?

23 A. Me and him.

24 Q. What is your understanding of what

25 he's conveying on 262?

1 Yvette Wang

2 A. My understanding, he was trying to
3 still explain the meeting of January 26th.

4 Q. What was he saying about that?

5 A. January 26th meeting, basically both
6 of them, Ms. Wallop, Mr. Waller apologize,
7 said they had internal communication problem
8 with their project manager and team. So they
9 didn't, firstly, deliver the weekly and
10 monthly reports as contract signed requested.

11 Second, the report they delivered on
12 January 16th was not a report requested and
13 signed in the contract at all. They admitted
14 about two points and apologized many times,
15 and offered ten days. So this message, in my
16 understanding, is a follow-up message of that
17 meeting.

18 Q. He says that is the logic of the
19 system. What is he referring to?

20 A. I don't understand.

21 Q. And then he says, We can
22 short-circuit the logic of the immediacy of
23 results but it will complicate the
24 longer-term results of finding hidden people
25 and properties.

1 Yvette Wang

2 A. I don't understand.

3 Q. You never discussed that with him?

4 A. No.

5 Q. You didn't discuss that on January
6 26th?

7 A. No. January 26th, many is about
8 their apology.

9 Q. Wasn't it in large part about them
10 explaining that there had to be a base of
11 knowledge built up on the research team in
12 order to provide additional information over
13 the long term?

14 MS. TESKE: Object.

15 MR. GRENDI: Objection.

16 A. You mean when? When to discuss that
17 you mean?

18 Q. On January 26th.

19 A. No. They didn't explain about this
20 too much in my best of my memory.

21 Q. He didn't talk about, you know,
22 basically rushing things now will only hurt
23 us down the road?

24 MS. TESKE: Object.

25 A. To best of my memory, I don't

1 Yvette Wang
2 remember that, which means not really too
3 much. And many apologies. And their
4 miscommunication and misunderstanding
5 internally.

6 Q. You think maybe they were just
7 saying, Hey, sorry, we had a
8 misunderstanding, but you don't understand
9 what's going on here?

10 MR. GRENDI: Objection. You
11 can answer.

12 A. What is your question?

13 Q. Isn't it possible they're just
14 saying in a more casual sense, I'm sorry,
15 we've had a misunderstanding, but your
16 expectations are not consistent with the
17 contract?

18 A. No.

19 Q. No, they didn't say that?

20 A. They didn't say the second half of
21 your sentence, but they said first half of
22 your sentence.

23 Q. And you understood that to mean --
24 you took that to mean they screwed up?

25 A. They admitted they screwed up.

1 Yvette Wang

2 Q. How did they admit it? What words
3 did they use?

4 A. They said we're sorry and I had
5 miscommunication, and my project manager
6 misunderstood the request and the
7 instruction.

8 Q. What was the request and the
9 instruction being discussed?

10 A. That is their internal problem
11 between their management team, which is Mike
12 and Ms. Wallop and their project manager and
13 their team.

14 Q. So you don't know anything about
15 that?

16 MR. GRENDI: Objection. You
17 can answer.

18 A. That's right.

19 Q. Wasn't there a discussion, though,
20 that the detail you were expecting so soon
21 wasn't realistic?

22 MS. TESKE: Object.

23 A. You mean on January 26th meeting?

24 Q. Yes.

25 A. No.

1 Yvette Wang

2 Q. None of that was said?

3 A. Nothing about that.

4 Q. What specifically did they say they
5 should have delivered but they had not
6 delivered?

7 A. They admitted they had internal
8 communication mistake. You remember, I said,
9 Mike was sweating a lot when he was
10 conducting the laptop, I will refresh that
11 memory. And he was keep telling us, this --
12 he understand and he realized this is not a
13 report which should be delivered to us. So
14 he clearly said that.

15 Q. But what did he say, though, that
16 was wrong with the report? Did it need more
17 time? Did it need more information?

18 A. They didn't say -- he didn't say
19 needed more time and more information. I
20 remember he basically said his project
21 manager understood wrongly about his
22 instruction.

23 Q. What instruction?

24 A. Like what the report should look
25 like. So that's why the report he presented

1 Yvette Wang
2 to us on January 26th, that was a report he
3 clearly said, I know this is not what you are
4 waiting and what you hope or expect to see.

5 Q. Did he say that you were entitled
6 to?

7 A. Yes.

8 Q. He did say that? What words did he
9 use?

10 A. Words he used? He used about like
11 80 percent of my words I just used when I
12 said that sentence.

13 Q. You have to tell me what that is.
14 What did he say about the deliverables under
15 the contract? I want to know the exact words
16 that came out of his mouth?

17 A. Whose mouth?

18 Q. Michael Waller.

19 A. I cannot remember 100 percent. But
20 I already repeat 80 percent of the words he
21 used.

22 Q. Wasn't he complaining the research
23 team was out there putting together a base
24 knowledge, and that's standard operating
25 procedure within the industry?

1 Yvette Wang

2 MS. TESKE: Object.

3 MR. GRENDI: Objection.

4 A. What is your question?

5 Q. Wasn't there a discussion of what
6 standard operating procedure in the industry
7 was?

8 MR. GRENDI: Same objection.

9 MS. TESKE: Same objection.

10 A. I don't remember that clearly. But
11 I believe when Mike and Ms. Wallop presented
12 their capability to Mr. Guo, and sometimes I
13 was there, I heard that they, like, put
14 together a team, they have, like, operational
15 space, like that.

16 Q. I'm saying that you have to build a
17 base of knowledge and that each report will
18 build on that base of knowledge, you don't
19 get a final report each and every time. Any
20 discussion about that?

21 MS. TESKE: Object.

22 MR. GRENDI: Objection.

23 A. I don't remember.

24 Q. You don't remember at all?

25 A. No.

1 Yvette Wang

2 Q. But it will complicate the
3 longer-term results of finding hidden people
4 and properties?

5 A. Which page?

6 Q. Very first page of Exhibit 19, page
7 262. Do you know what he means by that?

8 A. Where is the sentence?

9 Q. Right in the middle of the text
10 message.

11 (Witness peruses document.)

12 A. Okay. I don't understand what he
13 means in here.

14 Q. Does that match or is that
15 consistent with anything he said at the
16 January 26th meeting?

17 A. No.

18 Q. How about we look at 264?

19 A. Yes.

20 Q. It says, I do not accept the
21 kindergarten comments. The team did not
22 present any decorations.

23 Do you see that?

24 A. Yes.

25 Q. And then it says, They are

1 Yvette Wang
2 developing a sound technical and method
3 logical base for a long-term project designed
4 to produce the desired results.

5 Do you see that?

6 A. Yes.

7 Q. Does that ring a bell at all? Was
8 that anything that was discussed at the
9 meeting?

10 A. This refers to the complaint from
11 Mr. Guo, because the whole process until this
12 message, Strategic Vision people, they spent
13 long, long, long time again, again, again,
14 repeatedly trying to educate Mr. Guo,
15 including me, sometimes. And --

16 Q. Is this after execution, before
17 execution?

18 MR. GRENDI: Objection. I ask
19 that you let the witness answer fully
20 when she's speaking. Continue.

21 A. The whole process. So Mr. Guo start
22 to lose patience. I mean, everyone. And he
23 basically said, Let's just stop the
24 decoration and are you guys capable of doing
25 this project or not?

1 Yvette Wang

2 Q. And what did Mr. Waller say in

3 response to that?

4 A. He did not agree.

5 MR. SCHMIT: Can I have this

6 marked as 20?

7 (Whereupon, at this time, the

8 reporter marked the above-mentioned

9 screen shot of text messages as Wang

10 Exhibit 20 for identification.)

11 BY MR. SCHMIT:

12 Q. I've handed you what's been marked

13 as Exhibit 20. It's 265 through 266.

14 (Witness peruses document.)

15 A. Yes.

16 Q. Is this first text message from

17 Mr. Waller the information was to report

18 their own internal material to help them

19 understand their targets.

20 Do you see that?

21 A. Yes.

22 Q. Is he still referring back to the

23 January 26th meeting?

24 A. I believe so.

25 Q. Did you have -- at the January 26th

1 Yvette Wang

2 meeting, was there a discussion as to what
3 the information was and how it was going to
4 be used?

5 A. Which information? The information
6 here? This one? (Indicating).

7 Q. Yes. The information that was
8 reported on the 26th. Is this your
9 recollection of discussing how it was going
10 to be used by the team and how it was going
11 to be built on going forward, anything along
12 those lines?

13 MR. GRENDI: Objection. You
14 can answer.

15 A. You mean the information on the
16 Exhibit 12?

17 Q. No. I mean whatever information --
18 you said this was referring to the January
19 26th meeting. So I've been talking about
20 what was discussed --

21 A. In my understanding, the information
22 on your page 265 refers to still the internal
23 communication of Mr. Waller's internal team.
24 So I don't know what kind of information he
25 transferred to his own internal team, to help

1 Yvette Wang

2 them understand. That is my understanding.

3 Q. You said before you had never really
4 had a project like this before; is that
5 correct?

6 A. Correct.

7 Q. Did Mr. Guo ever talk to you about,
8 you know, his experience in these type of
9 research projects?

10 A. I don't remember.

11 Q. You never sat down and said, I've
12 done this before a couple of times, this is
13 how it works, this is what we can expect,
14 anything along those lines?

15 A. No.

16 Q. Did you ever, you know, when things
17 were coming back and Mr. Guo was complaining,
18 did you ever go out and talk with others and
19 try to figure out, is this how it really
20 happens? Is this really going wrong, or is
21 this what we should expect early in the
22 project, anything like that?

23 MS. TESKE: Object.

24 MR. GRENDI: Objection.

25 A. With who?

1 Yvette Wang

2 Q. Anybody.

3 A. For me, I didn't.

4 Q. Do you know if Mr. Guo did?

5 A. I have no idea.

6 Q. Did you -- do you know what his
7 basis was for his expectations for what would
8 be in those reports and how they could be
9 used?

10 MS. TESKE: Object.

11 MR. GRENDI: Objection.

12 A. What is your question?

13 Q. Do you know, do you have any idea
14 what the basis for his expectations was? I
15 mean, had he had prior experience doing this?
16 Had he worked with other teams? Had he done
17 research himself? Anything?

18 MR. GRENDI: Same objection.

19 MS. TESKE: Object.

20 A. I don't know, sorry.

21 Q. He never discussed that with you?

22 A. No.

23 Q. He never said, My God, we did this
24 before and within 72 hours we got all this
25 information from these people, nothing along

1 Yvette Wang

2 those lines?

3 MS. TESKE: Objection.

4 A. I don't remember. I don't remember.

5 Q. Back to Exhibit 20.

6 A. Yes. I am there.

7 Q. It says, As you know, big budget is
8 ready for this long-term project. Investors
9 can even pay your team without contract.

10 What does that mean?

11 A. The first sentence, big budget is
12 ready for this long-term project, which I was
13 told by Mr. Guo. In my understanding, the
14 dissidents of Chinese government who are the
15 real fighters for Chinese democracy and rule
16 of law, they are a group of people in my
17 understanding, so that is referring to that.
18 The investor can even pay your team without
19 contract, this refers to the one million,
20 which we just discussed about that.

21 Q. Who were the investors?

22 A. The people, this is my definition,
23 the people who are the real fighter for rule
24 of law and democracy of China.

25 Q. Are they shareholders of Eastern

1 Yvette Wang

2 Profit?

3 A. I don't know.

4 Q. Do they invest into ACA Capital

5 Limited?

6 A. I don't know.

7 Q. Does investor have anything
8 whatsoever to do with actually putting money
9 towards the project?

10 A. I have no knowledge about this.

11 Q. How is Eastern going to put this
12 budget together?

13 A. I have no idea.

14 Q. I mean, you testified earlier, as
15 far as you know, Eastern Profit didn't have
16 bank accounts; is that right?

17 MR. GRENDI: Objection.

18 A. You mean have or did not have?

19 Q. Does Eastern Profit have a bank
20 account of any kind?

21 A. I don't know.

22 Q. Does Eastern Profit have investments
23 of any kind?

24 A. No idea.

25 Q. Does Eastern Profit have a budget --

1 Yvette Wang

2 excuse me, a brokerage account with anybody?

3 A. No idea at all.

4 Q. Does Eastern Profit have clients or

5 customers?

6 A. I have no knowledge about this.

7 Q. How does Eastern Profit make money,

8 if it does?

9 MR. GRENDI: Objection. You

10 can answer.

11 A. I heard this is an investment

12 company, that's it.

13 Q. Who did you hear that from?

14 A. Mr. Guo.

15 Q. What did he say regarding

16 investments?

17 A. This is an investment company.

18 Q. Eastern Profit?

19 A. Yes.

20 Q. Well, who conducts the investments

21 and how do they conduct their business?

22 Where are they investing? Tell me about it.

23 A. He didn't say.

24 Q. He just said that it's an investing

25 company?

1 Yvette Wang

2 A. Correct.

3 Q. Did they have a portfolio they were
4 managing?

5 A. I have no idea. I didn't check. I
6 have no idea.

7 Q. And you didn't speak with Mr. Guo
8 about today's deposition at all in order to
9 prepare; is that right?

10 A. I told him.

11 Q. No, but did you speak to him and
12 say, What can you tell me about Eastern
13 Profit, I'm being deposed as their
14 representative, anything along those lines?

15 A. No, not in that detail. I didn't
16 even see him.

17 Q. What did you say to him on the
18 phone -- did you speak with him on the phone?

19 A. I mentioned to him a couple of days
20 ago, I have this deposition.

21 Q. What was his reaction?

22 MS. TESKE: Object.

23 A. He said okay.

24 Q. Did you explain to him you were
25 testifying as a representative of Eastern

1 Yvette Wang

2 Profit?

3 A. I didn't go that detail.

4 Q. Did he seem to know anything about

5 the deposition, that it was occurring or

6 otherwise?

7 MS. TESKE: Objection.

8 MR. GRENDI: Objection.

9 A. I didn't -- no.

10 Q. Does Eastern Profit have any assets

11 whatsoever as far as you know?

12 A. No idea.

13 Q. Does it have a relationship with a

14 bank? Does it have any loans or anything

15 like that?

16 MR. GRENDI: Objection. You

17 can answer.

18 A. No idea about their loan with bank.

19 MR. SCHMIT: Why don't we take

20 five minutes?

21 MR. GRENDI: I was just going

22 to say that.

23 (Whereupon, a brief recess was

24 taken.)

25 MR. SCHMIT: Mark this as

1 Yvette Wang

2 Exhibit 21.

3 (Whereupon, at this time, the
4 reporter marked the above-mentioned
5 screen shot of text messages as Wang
6 Exhibit 21 for identification.)

7 BY MR. SCHMIT:

8 Q. I'm going to hand you what's been
9 marked as Exhibit 21.

10 A. Thank you.

11 Q. It is a two-page text message, 259
12 through 260. Do you have that in front of
13 you?

14 A. Yes.

15 Q. If you can just read the message and
16 let me know when you're finished.

17 (Witness peruses document.)

18 A. Yes, I finished.

19 Q. Did you receive this text message?

20 A. Yes.

21 Q. Did you ever discuss these issues
22 with Mr. Waller?

23 A. I believe no.

24 Q. Did you ever discuss them with Mr.
25 Guo?

1 Yvette Wang

2 A. I mentioned this message to him.

3 Q. And what was his reaction?

4 A. He said they are making excuse and
5 it doesn't make any sense.

6 Q. Why did he think it didn't make any
7 sense?

8 MS. TESKE: Object.

9 A. I believe the two pages here, the
10 main spirit or the main contact with never
11 included in the contract, which is signed on
12 January 6th.

13 Q. I'm sorry, what's not included?

14 A. The content of here.

15 Q. Did Mr. Guo ever discuss that based
16 on his experience this isn't how it worked or
17 Mr. Waller had it all wrong?

18 A. He didn't mention that to me.

19 Q. In this context, was Mr. Guo getting
20 more and more agitated?

21 A. What do you mean agitated?

22 Q. Angry, frustrated.

23 MS. TESKE: Object.

24 A. Oh, yes.

25 Q. And in this time, did he ever say

1 Yvette Wang
2 why he needed this information so
3 immediately?

4 MR. GRENDI: Objection.

5 A. No, he didn't mention that. He said
6 that before already.

7 Q. He said what before?

8 (Witness peruses document.)

9 Q. Are you looking for a particular
10 message?

11 A. Yes. There was a timeline in my
12 text message. On your Exhibit number 18,
13 page 233, conveyed to him, this is my
14 message, on January 16, to French Wallop, I
15 said, Convey to him, he advised that if you
16 could make it he needs to see the report
17 before January 25th. And he has some plan
18 from January 6th, which will need your input.

19 Q. But did he ever tell -- as far as
20 you know, did he ever tell you, let's start
21 there, what the plan was? That was the
22 question.

23 MR. GRENDI: Objection. We've
24 been over this a couple of times now,
25 but go ahead.

1 Yvette Wang

2 A. I believe I replied to you, sir, at

3 least twice.

4 Q. That's fine.

5 A. And I don't know the plan details.

6 Q. Do you have any sense of why there

7 was this need for immediacy?

8 A. Immediacy, you mean immediately?

9 Q. Yes.

10 A. I don't think it's immediately.

11 Q. Was time of the essence or do you

12 have any idea what was going to happen?

13 MR. GRENDI: Objection. I

14 just -- I'd recommend just using some

15 phrases that are perhaps a little

16 more straightforward. I want to make

17 sure the witness clearly understands

18 and can answer correctly, that's all.

19 Go ahead.

20 A. What is your question?

21 Q. You're the 30(b)(6) witness for

22 Eastern Profit?

23 A. I am.

24 Q. And you've educated yourself for

25 today's deposition. Looking back, you have

1 Yvette Wang
2 no idea what the plan was you've said or why
3 this information was needed; is that a fair
4 statement?

5 MR. GRENDI: Objection. You
6 can answer.

7 A. I can tell you which I was told by
8 Mr. Guo. His plan is his whistle blowing and
9 disclosure corrupted Chinese official, and to
10 bring the justice and bring the truth to the
11 public. That is his plan, and --

12 Q. Go ahead, were you done?

13 A. I'm done.

14 Q. Has he been unable to do that, has
15 he missed a milestone or some sort of
16 deadline that has in any way hurt his plans?

17 MS. TESKE: Objection.

18 MR. GRENDI: Objection.

19 A. Yes. You are right. Sounds to me,
20 he had his deadline, timeline to wait for
21 this information.

22 Q. And going back, though, has it in
23 some way, has Eastern Profit, let's put it
24 that way, been hurt, because it didn't have
25 information expected on January 26th or

1 Yvette Wang

2 January 31st?

3 A. What is your question?

4 Q. Has Eastern Profit been damaged at

5 all because it didn't have the information it

6 wanted on January 26th or January 31st?

7 A. Okay. I'm glad I asked you.

8 Q. Go ahead.

9 A. I believe I replied before, but I

10 will reply again. The damage to Eastern

11 Profit should be based on Eastern Profit

12 calculation, which for now, I don't know.

13 Q. So you can't, sitting here today,

14 identify any damages that Eastern Profit has

15 suffered?

16 MR. GRENDI: Objection. It's

17 not how the witness testified

18 earlier, but go ahead.

19 Q. Then tell me all you know about the

20 damages that Eastern Profit has suffered.

21 A. I will. So far, for now, and I can

22 see that is a loan, need to pay back. Legal

23 fee, logistics, all the related fees, right?

24 But I believe this is not all their damage.

25 Q. Is there -- is there a particular

1 Yvette Wang

2 clause in the contract that would entitle you
3 to legal fees? Do you know anything about
4 that?

5 A. Which contract? Which clause?

6 Q. Any one that would entitle Eastern
7 Profit to damages, including legal fees?

8 MS. TESKE: Objection.

9 MR. GRENDI: Objection.

10 A. I didn't see any contract except
11 this one.

12 Q. Okay. What clause in that contract,
13 the contract we're discussing today, would
14 entitle you to legal fees?

15 MR. GRENDI: Objection.

16 You can answer.

17 A. There's no clause in this contract,
18 I believe.

19 Q. Okay. I mean, go ahead, if you can
20 point it out. I would like to have you point
21 it out.

22 (Witness peruses document.)

23 A. I believe in this contract, it
24 didn't say anything about legal fees.

25 Q. And with respect to the loan, just

1 Yvette Wang
2 so the record is clear, other than Mr. Guo
3 said, the payment from ACA Capital LTD, that
4 was made to Strategic Vision, other than
5 that, do you know anything else about that
6 loan?

7 MR. GRENDI: Objection.

8 A. No.

9 Q. Now, you keep saying it's going to
10 be based on Eastern Profit calculation. Do
11 you know anything, sitting here today, any
12 information you need, you being Eastern
13 Profit, in order to conduct that calculation?

14 MR. GRENDI: Objection. You
15 can answer.

16 A. I don't know.

17 Q. You said logistics. What do you
18 mean by that?

19 A. Travel.

20 Q. So expenses?

21 A. Yes.

22 Q. Have you identified any expenses
23 that you would tie into the breach, like what
24 expenses are you talking about?

25 A. Like for example, I traveled to

1 Yvette Wang

2 Virginia, and my hotel, air tickets, train

3 tickets.

4 Q. Will Eastern Profit be submitting a
5 calculation based on those type of expenses?

6 MS. TESKE: Objection.

7 MR. GRENDI: Objection.

8 A. Not yet.

9 Q. Do you know?

10 A. Not yet.

11 Q. Are they going to?

12 MS. TESKE: Objection.

13 MR. GRENDI: Objection.

14 A. I don't know.

15 Q. You don't know?

16 A. No.

17 Q. Are you collecting receipts and
18 submitting them?

19 MR. SCHMIT: It's a fair
20 question.

21 MR. GRENDI: I'm trying to
22 figure out, submitting to where?

23 MR. SCHMIT: To anybody.

24 Q. Are you collecting your receipts?

25 A. I have my receipts.

1 Yvette Wang

2 Q. Has anybody asked you to collect

3 them and gather them?

4 A. I have my regular habits to keep all

5 receipts.

6 Q. But for purposes of this case, have

7 you been asked to collect all your expense

8 reports, receipts, whatever you might have?

9 MR. GRENDI: Objection. You

10 can answer.

11 A. Asked by who?

12 Q. Anybody.

13 MR. GRENDI: Objection. Just

14 if you're asking about anything that

15 counsel has directed her to do I am

16 going to object, but go ahead.

17 A. My attorney mentioned that to me.

18 MR. GRENDI: I think -- you're

19 talking about right now?

20 MR. SCHMIT: Somebody will let

21 me know if there's going to be an

22 expense calculation, I'm sure.

23 Let's mark this as 22.

24 (Whereupon, at this time, the

25 reporter marked the above-mentioned

1 Yvette Wang

2 screen shot of text messages as Wang

3 Exhibit 22 for identification.)

4 BY MR. SCHMIT:

5 Q. I will hand you what has been marked

6 as Exhibit 22.

7 A. Thank you.

8 Q. If you can just take a look and let

9 me know when you finish.

10 (Witness peruses document.)

11 A. Yes, I finish.

12 Q. Do you recall this exchange?

13 A. Yes.

14 Q. What was your reaction to

15 Mr. Waller's statement in this text?

16 A. Obviously, he was still trying to
17 explain, followed the January 26th meeting.

18 And same time, he's making more excuses.

19 Q. Do you have any reason to believe
20 anything he says in here isn't true?

21 A. I don't think it's true.

22 Q. Why?

23 A. Because before the contract signed
24 and even in the contract, which is signed, of
25 your Exhibit number 2, there is nothing

1 Yvette Wang
2 mentioned on your Exhibit number 22, which
3 means, Strategic Vision just show the excuses
4 and explanation after almost like three weeks
5 later or one month later of contract signed.

6 Q. Is there anything in the contract
7 that contradicts what's said in this text
8 message?

9 MR. GRENDI: Objection. You
10 can answer.

11 A. I don't want to use contradict.

12 Q. Well, how would you --

13 A. Because your number 2 exhibit,
14 contract and your number 22 exhibit, has no
15 relationship at all, which means, the content
16 here of Exhibit 22, was never mentioned in
17 the contract which is signed of your Exhibit
18 2.

19 Q. But we talked earlier about what was
20 meant by the report in the contract. Is
21 there a specific -- there was no specific
22 format for the report, right?

23 MR. GRENDI: Objection.

24 A. Format, you're talking about like --

25 Q. Anything.

1 Yvette Wang

2 A. Excel? Like Word? PDF? Correct.

3 Q. Was it explained precisely what was
4 needed in those reports in the contract?

5 A. In my understanding, your Exhibit 22
6 is about --

7 Q. I'm asking about the contract now.

8 A. No, I didn't finish, sorry. Your
9 Exhibit number 22 is the message Mr. Michael
10 Waller was trying to explain their, like,
11 work mechanism or how they work. It's not
12 about the report. That is my understanding.
13 For example, he said on your page 257, the
14 reports are not actionable but to show how
15 the work is being executed.

16 Q. It mentions the reports?

17 A. That's right. It's not actionable.

18 Q. What is your understanding of that
19 term?

20 A. My understanding is the reports,
21 they are not the reports mentioned in the
22 contract, which is signed here (indicating).

23 Q. Did Mr. Waller ever say that?

24 A. No, I didn't talk with him about
25 this. We did text message.

1 Yvette Wang

2 Q. In the text, did he ever say that?

3 A. Who ever say what?

4 Q. That the reports being sent or the
5 flash drives were not what was -- was not
6 consistent with the contract.

7 A. From the message exhibit here, he
8 didn't say that precisely words. It's just
9 you're asking my understanding. That is my
10 understanding.

11 Q. And just to be clear, though, you
12 had never worked on a project that involved
13 reports on a research of individuals or
14 anything along these lines?

15 A. You are correct. But --

16 Q. And has Mr. Guo ever worked on a
17 project as far as you know, along these
18 lines?

19 MS. TESKE: Objection.

20 MR. GRENDI: Objection.

21 A. Mr. Who? What is your question?

22 Q. Mr. Guo. Had he ever worked on a
23 project along these lines, involving reports?

24 MS. TESKE: Same objection.

25 MR. GRENDI: Same objection.

1 Yvette Wang

2 A. I have no idea.

3 Q. You never talked to him about it?

4 A. I don't remember I did.

5 MR. SCHMIT: That's all I have.

6 MR. GRENDI: Okay.

7 THE REPORTER: Counsel, would
8 you like to order a copy of the
9 transcript?

10 MS. TESKE: Yes.

11 MR. GRENDI: Let me get back to
12 you about that.

13

14 (Whereupon, at 5:07 p.m., the examination
15 of this witness was concluded.)

16

17

18 YVETTE WANG

19

20 Subscribed and sworn to before me

21 this _____ day of _____, 2019.

22

23

24 NOTARY PUBLIC

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I N D E X

EXAMINATION BY	PAGE
Mr. Schmit	4

E X H I B I T S

WANG	DESCRIPTION	PAGE
1	Notice of deposition	7
2	Research agreement	11
3	Responses and objections to interrogatories	23
4	Research agreement	51
5	Screen shot of text messages	103
6	Three-page letter	135
7	Bank document	158
8	Corporate telegraphic transfer cancellation amendment request	160
9	E-mail chain	161
10	Handwritten document	164
11	Complaint	167
12	Name list	212
13	Background report	216
14	Background report	219
15	Screen shot of text messages	224
16	Screen shot of text messages	230

(Exhibits cont.)

WANG	DESCRIPTION	PAGE
17	Screen shot of text messages	234
18	Screen shot of text messages	240
19	Screen shot of text messages	244
20	Screen shot of text messages	254
21	Screen shot of text messages	263
22	Screen shot of text messages	272

1
2
3
4
5
6
7
8
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11
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14
15
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I, MICHELLE LEMBERGER, a shorthand
reporter and Notary Public within and for
the State of New York, do hereby certify:

That the witness(es) whose testimony
is hereinbefore set forth was duly sworn by
me, and the foregoing transcript is a true
record of the testimony given by such
witness(es).

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome
of this matter.

MICHELLE LEMBERGER

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DEPOSITION ERRATA SHEET

Case Caption: Eastern Profit Corp v.
Strategic Vision LLP

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of my
Deposition taken in the captioned matter or
the same has been read to me, and the same is
true and accurate, save and except for changes
and/or corrections, if any, as indicated by me
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in and for the State of _____

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	177 214:13	23rd 136:3 202:3,24 203:2,8
<hr/>	18 239:25 240:6,9 265:12	257 275:13
<hr/>	19 244:3,7,10 252:6	259 263:11
\$	195 217:8	25th 243:11 265:17
\$250 215:22 216:3	1st 175:21 176:3	26 142:21
\$750,000 55:11 57:18 200:13,16	226:13	260 263:12
\$9 58:22	<hr/>	262 244:12,25 252:7
<hr/>	2	264 244:13 252:18
0	<hr/>	265 254:13 255:22
000171 212:10 213:4	2 11:18,21,25 12:10	266 254:13
000233 243:7	26:22 56:14 59:18	267 244:15
000259 212:10 213:4	73:23 77:20 85:20	268 244:14,15
<hr/>	134:20 137:13 159:14	26th 139:18 140:2 142:15,20,22 143:19 144:6,16 145:8,11 147:2 148:6 149:2,13 151:2,24 152:11 154:9 243:12 245:3,5 246:6,7,18 248:23 250:2 252:16 254:23, 25 255:8,19 267:25 268:6 273:17
1	199:8 204:4 211:14, 17 241:4,16 273:25 274:13,18	276 162:6
1 7:16,23 8:3 51:15, 16 150:16	20 74:11 254:6,10,13 258:5	278 162:6
1/1 176:3	2017 10:20 11:2 15:15 68:22,24 106:14 114:25 124:15,17 125:15,23 214:24 215:2	279 160:12
1/30 144:12	2018 10:21,24 11:2 51:15 57:6 136:3 142:21,24 159:15 166:18,19	280 160:12
1/31 144:12	2019 277:21	2nd 172:9 175:21,22 206:2
1/6 72:10	208 233:6	<hr/>
10 146:5 164:19,24 165:3,5	2081 225:6	3
100 145:9 250:19	21 158:17 263:2,6,9	3 23:4,8,12 26:20 97:12
10022 4:12	211 228:6,7	30 74:11 168:3 202:5, 22 241:9,11,13
11 167:2,5,9	212 228:15	30(b) (6) 5:2,7 6:22 8:6 19:13 20:23 94:13,24 169:20 207:2 266:21
12 22:18 57:18 58:23 70:15 146:5 212:20, 24 219:3 221:24 236:8,18 237:4 255:16	213 225:8	30-year 58:21
12th 114:14	214 230:20 233:10	30th 114:19 151:22
13 216:22,25 217:5	216 233:12	31st 149:3,14,15,16 151:19,22 268:2,6
14 219:7,10,14,17	219 230:20	32 179:13
143 219:20	22 158:17 272:23 273:3,6 274:2,14,16 275:5,9	34 198:8 203:25
144 217:8	220 235:4 236:22	<hr/>
14th 222:22	222 235:5	4
15 224:19,24 225:3 233:4,6 241:10	223 240:11	<hr/>
150 4:11	224 241:17	4 51:7,10,14,16 57:2
15th 222:23 226:15	22D 4:11	
16 230:11,15,18 233:9 265:14	23 219:18	
16th 139:7 141:3 143:13 245:12	233 265:13	
17 234:18,23,25 235:4 236:22 237:9 239:5	239 240:12	
175 214:10		

40 127:2	21 222:6 250:11,20	added 240:19
<hr/>	800 22:15	adding 242:7
5	8th 236:5 239:5,9,16, 23	additional 206:5 246:12
<hr/>	<hr/>	additions 228:18
5 59:25 103:9,13,16 109:13 199:10 211:17 214:10	9	address 4:10
57th 4:11	<hr/>	admit 248:2
5:07 277:14	9 60:2 161:21,25 162:5,13,15	admitted 143:3 236:18 238:6 245:13 247:25 249:7
5th 226:5 227:20 228:5	<hr/>	advance 61:22
<hr/>	A	advertisement 73:13
6	above-mentioned 7:21 11:20 23:6 51:9 103:11 135:19 158:7 160:3 161:24 164:22 167:4 212:19 216:24 219:9 224:22 230:13 234:21 240:4 244:5 254:8 263:4 272:25	advise 116:23 141:9 189:7
<hr/>	absent 89:7	advised 57:24 226:2 265:15
6 10:24 135:17,20,24 141:6 179:9	ACA 40:6,18,22 41:5 43:9,18,20,25 44:10, 11,16,20,24 45:21 46:4,7,11,15,19,24 47:22 63:2,14,16 67:19 107:15 108:8, 16,25 159:17,18 160:20 162:20 168:15 169:2,9 170:21 171:7 207:10 259:4 270:3	advising 30:3
60 147:20 151:13 152:21	accept 147:13 252:20	advisor 29:24 101:11
61 103:19	access 128:16 194:5, 11	affiliated 9:8 46:11
65 109:14	Accident 64:18	affiliation 37:2
66 112:2	account 29:15 57:8 82:24 171:16 173:3, 4,10 177:5 205:13 259:20 260:2	afield 20:17,21
6th 43:10,12 67:4 69:15 72:13 139:7,10 141:4 143:13,16 149:20 151:19 171:20 172:11 177:8,11,23 229:4 236:5 237:11 238:20,25 239:21,23 264:12 265:18	accounting 57:13	afraid 131:22 133:2
<hr/>	accounts 194:11 259:16	afternoon 120:19 152:18 176:7
7	accurate 42:15	agent 124:7
<hr/>	action 5:3 34:19 50:14 141:11 166:4 167:10 192:15	agitated 264:20,21
7 158:5,8,12 162:13 194:20 214:13	actionable 275:14,17	agree 44:24 45:3 57:20,21 65:6 115:4 134:20 174:12 175:14 176:13,14 208:22 210:23 227:9,17 254:4
70 74:13	activity 193:10	agreed 57:3,10 62:9 65:11 73:18 113:14, 15 114:14 115:2 139:6 147:9 210:3,5 227:14 228:16
72 257:24	actual 13:16	agreement 11:21 51:10,15 56:5,10,13, 20,22 57:5 58:6 61:8 69:12 70:22 72:18 80:3 83:24 84:2 85:24 88:25 103:5 113:18 116:17 134:19 137:8,13 141:13 142:13 144:20,24 145:2 171:20 173:2 176:10 177:22 198:21 227:25 231:19 233:25
73 114:4	add 35:12	agrees 207:15
750,000 57:6,25 58:4, 7,8,16,23 209:12,14, 19 210:2 211:7,8		
76 103:20		
<hr/>		
8		
<hr/>		
8 159:25 160:6,10 162:12,13		
80 74:13 144:10 151:13 152:21 217:16,19,21,24 219:23 221:8,14,18,		

<p>ahead 15:13 16:7 24:8 27:7 31:23 42:17 71:4 82:2,4 127:3,23 140:24 141:25 143:15 208:18 210:4 217:12 265:25 266:19 267:12 268:8,18 269:19 272:16</p> <p>air 271:2</p> <p>allegations 167:18</p> <p>alliance 157:9</p> <p>allowed 36:22 128:12 131:7</p> <p>amendment 160:5,18</p> <p>amount 54:15,21 61:24 102:21 173:8</p> <p>amounts 58:14 102:8</p> <p>analogy 191:17</p> <p>Angry 264:22</p> <p>animals 31:11</p> <p>answering 6:24 7:4,5</p> <p>answers 5:12 12:7 97:14,18 99:2 100:8, 13,16</p> <p>anymore 174:13 239:3</p> <p>apartment 4:11 90:9 106:16 120:15 125:18</p> <p>apologies 247:3</p> <p>apologize 245:6</p> <p>apologized 140:3,8 143:4,22 146:16 245:14</p> <p>apologizing 147:15</p> <p>apology 246:8</p> <p>apparently 20:25</p> <p>appears 72:17</p> <p>applies 31:21</p> <p>Approximately 166:14, 15</p> <p>area 123:2 129:21</p> <p>areas 31:9</p> <p>argue 115:17,18</p> <p>argument 54:18 67:9 208:21 210:22</p> <p>argumentative 207:5</p> <p>arranged 177:4</p> <p>article 39:10</p> <p>Asia 78:11</p> <p>assassinated 133:2</p>	<p>assets 33:2 45:23 188:15 262:10</p> <p>assisted 35:15</p> <p>assisting 232:12</p> <p>associate 78:8</p> <p>associates 19:2</p> <p>assume 23:25 163:13 185:14 204:12 208:21 209:2,19 211:2 232:17</p> <p>assuming 209:18 210:17</p> <p>attachment 6:23 19:13</p> <p>attempt 91:8 182:14</p> <p>attempted 164:2</p> <p>attempting 163:22</p> <p>attend 91:4</p> <p>attorney 5:6 21:4,8 25:12,19,25 27:5 28:7 92:13 94:6,16, 18 272:17</p> <p>attorney-client 167:22</p> <p>authorities 34:19</p> <p>automatically 234:13</p> <p>Avenue 22:15</p> <p>aware 27:10,12 87:24 88:14 89:19,21 92:7 122:25 125:22 171:3 231:23</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>back 34:22 43:16 44:16,22 47:5,9,14, 23 62:16 65:7 82:4 83:9 84:22 88:9 91:20 107:17,18,22 108:12,22 109:2,13 114:12 115:8 116:17 123:20 128:7 132:8 133:16 138:13 141:19 152:4 153:7,9 155:15 163:22 164:2,3,13 168:17 169:6,8,10,18 171:15 174:22 176:7, 8 199:5 203:22 205:17 206:7,14 211:14 219:2 226:14, 16 227:11 234:3,13, 17 236:21 237:17</p>	<p>238:10,17 239:8 241:12 242:18 254:22 256:17 258:5 266:25 267:22 268:22 277:11</p> <p>background 216:25 217:7 219:10</p> <p>bad 116:18 128:25 132:15</p> <p>bank 29:14 57:8 82:11,15,20,24 158:8,23 159:11 163:4,14 171:16 190:18,24 191:15 194:11 259:16,19 262:14,18</p> <p>bank's 82:18</p> <p>banking 163:4</p> <p>banks 194:5</p> <p>bar 151:17 152:17 217:21</p> <p>base 192:18 246:10 250:23 251:17,18 253:3</p> <p>based 7:5 17:17 59:11 60:24 71:15 73:7,17 79:6 81:16,17 82:6, 7,25 99:10,12,13 133:21 145:25 151:8 168:11 170:7 202:22 205:10,11 206:18,19 209:16 264:15 268:11 270:10 271:5</p> <p>basically 79:8 105:10 146:24 150:6 186:13 209:25 245:5 246:22 249:20 253:23</p> <p>basis 167:17 169:23, 25 190:22 199:13 201:3,9,11 211:18 257:7,14</p> <p>bearing 225:6</p> <p>began 46:16</p> <p>beginning 31:22 57:16 67:5,23,25 68:4 75:2 89:8,9 90:23,24 115:18 137:21 173:16 202:24 228:17 241:25</p> <p>behalf 13:4,21 17:7 20:7,15,24 21:5 26:4 37:21 63:17 65:25 87:10 104:24 168:25 170:25 231:5</p>
--	--	--

beings 32:7 belief 198:13 believed 38:4 197:5 198:3 believes 142:2,3 bell 253:7 belong 92:7 beneficiary 159:3 big 37:13,16 74:23 119:8 128:23 173:8 258:7,11 bigger 76:5 biggest 67:9 134:2 bill 200:13 birth 218:20 bit 6:2 17:12 42:8 70:16 73:2 169:19 172:3 bits 223:3 black 73:3 blog 232:25 blow 34:16 35:4 39:8 blower 222:14 blowing 267:8 blue 121:4 blurry 146:11 board 16:13 book 5:15 books 91:20,23 92:7 born 107:7,8 borrow 44:11,12 169:7,17 boss 97:3 228:17,22 229:17 bottom 59:17 114:6 235:24 236:15 box 225:20,21,22 231:4 232:16 breach 154:7 168:4 270:23 break 7:17 84:9,12,22 86:6,10,12,17 150:19,22 155:10 203:17 breaker 129:11 breaking 187:25 188:3 190:18,24 briefly 24:20 70:25 143:21	bring 131:24 147:24 267:10 brings 48:11 brochure 120:19 121:5,19 122:7,10,20 broken 39:18 brokerage 260:2 brought 20:23 48:25 49:6 120:15,19 122:3,10,14 145:13, 17 177:8 budget 258:7,11 259:12,25 build 77:10 251:16,18 Buildings 31:10 built 246:11 255:11 bunch 158:17 business 17:9 46:6 55:20,22 121:11 196:20 200:15 260:21 busy 237:5 buy 66:24 126:14 129:12,14	capability 82:10,14 251:12 capable 150:11 181:12 183:11 187:23 253:24 Capital 40:6,22 41:5 43:10,18,20 44:10, 11,16,21,24 45:21 46:4,7,12,15,19,24 47:22 63:3,16 67:19 107:16 108:9,16,25 159:17,18 160:20 162:20 168:15 169:2, 9 170:21 171:8 207:10 259:4 270:3 Captain 243:3,5 car 123:16,18,19,23 127:9 128:10,11,13 130:16 131:19 132:11 133:16 234:12 cares 37:8 71:23 carry 155:22 carrying 157:19 carte 54:19 66:23 115:20 case 19:16 20:24 22:22 164:18 166:5 206:25 272:6 casual 247:14 category 241:14 caused 169:24,25 caution 167:21 cell 189:21 190:2,5 cemetery 128:23 129:6,7,12,18 chain 161:25 chance 70:14 132:2 152:6,8 214:2 change 6:11 66:18,19, 21 changed 177:7 Chao 120:3 characterize 17:11 cheap 110:8 111:9 cheaper 110:25 111:14,20 cheated 142:3 check 53:7 60:10,12, 18 126:14 130:14 144:13 151:21,23 153:16 166:20 174:25 175:20 219:5 240:24
C		
C-H-U-N-G 26:16 calculate 202:17,18 calculation 168:12 170:8,10 268:12 270:10,13 271:5 272:22 call 54:19 60:6 68:9 70:19 72:25 73:5 78:6 79:12 90:14 96:5 114:6 195:11 220:19 243:6 called 31:25 35:20 44:17 54:3 55:20 58:5,25 70:20 120:20,21 144:9 145:14 177:25 184:13 236:23 241:10 calls 115:25 camera 123:21 cameras 124:4 cancel 160:25 161:5 canceled 161:11,15 cancellation 160:5,18 capabilities 186:22 187:3,17		

261:5	climb 82:19 187:24 188:14 190:13,16 191:8,9	complaint 91:18 92:21 166:16,20 167:5,9 185:15 198:19 204:2 253:10
checkable 84:5	climbed 191:14	complaints 204:13
checked 238:5	climbing 191:20 193:4,9,16,22	complete 5:12
China 19:21 20:11 33:7 34:22 37:25 38:7 51:2 107:9,10 258:24	close 60:22 77:19 111:21 120:11	Completely 220:10
Chinese 32:15,21 33:3 34:17,20 37:10,22, 23,25 39:9 106:25 134:3 154:22 222:21, 22,23 223:8 232:9 258:14,15 267:9	coach 98:17	compliance 80:24
choice 111:20	coaching 98:14	complicate 245:23 252:2
Chung 96:13	colleagues 96:4	compound 97:25
circumstances 204:11	collect 237:16 272:2, 7	comprehensive 75:17, 21 76:4
City 237:7	collecting 271:17,24	compromise 56:9,13, 16,18,19 57:22 70:11,17
clarified 24:17	color 225:21	compromised 56:8
clarify 24:18 25:13 26:9 42:10 48:14	comment 121:21 220:17	computer 237:2,12,13
clarifying 25:7	commentary 131:8	concept 67:16 68:5 75:19 114:2 115:22 116:6
clarity 6:17 41:19	comments 252:21	concepts 137:24
clause 112:8 113:17 116:16 269:2,5,12,17	committing 37:9	concern 5:23 62:12 133:4,18
claw 107:16 109:2 116:17	common 37:22 55:19 77:12,13 124:6 135:15 169:7,17,20 173:7 188:11 192:16, 19,20,21,22	concerns 213:25
clear 11:17 18:7 19:15 21:10 81:3 93:13 94:20 128:19 146:23 164:15 168:14 192:23 193:3 270:2 276:11	communicate 78:4 149:22	conclude 53:18
clearer 189:16	communicated 29:25 149:10,12	concluded 277:15
click 236:9	communicating 113:10	conclusion 74:23
client 11:14 12:25 14:17,19 28:12,13 29:21 49:5 54:25 55:11,12 57:19 66:23 71:15 73:9 84:18 101:13,14,15 142:5, 6,9 197:16 199:10 200:3,6 213:25 214:4	communication 46:17 63:13 140:5,12 146:17 150:5 244:20 245:7 249:8 255:23	condition 122:8 128:24 129:2
client's 196:3,4	communications 46:14 148:25 149:25 150:4 167:23	conduct 179:25 260:21 270:13
clients 18:19 48:6, 10,19,22,25 49:21 50:2,13,20 118:19, 20,23,25 119:8 181:25 182:6,8,23 183:11 194:22 195:9, 19 196:12,24 229:19 230:3,5,8 260:4	communicator 231:5	conducted 146:19
	Communist 33:9 36:16, 23 37:3 154:23 232:9,11	conducting 187:18 249:10
	companies 48:11	conduction 237:2
	company 9:11 11:8 17:14 18:11,16 21:3 45:23 49:20 117:13 260:12,17,25	conducts 260:20
	compared 74:3	conferred 178:23
	comparing 204:2	confidential 31:18 77:16 134:22 135:2,6 213:5,6
	compensation 28:16	confirmed 72:16 206:20
	complaining 250:22 256:17	confused 79:24 94:15 193:2
		connect 145:17
		connection 40:15 137:7 238:14
		considered 85:15 86:18,24

<p>consistency 6:17</p> <p>consistent 247:16 252:15 276:6</p> <p>constant 58:22</p> <p>consultant 29:24 101:11</p> <p>consulting 30:4</p> <p>contact 174:8 182:14 264:10</p> <p>contacted 227:7</p> <p>contacts 118:13</p> <p>content 145:22 264:14 274:15</p> <p>context 40:11 264:19</p> <p>continue 65:3 142:25 152:12 156:2,3 174:10 207:6 208:16 234:8 253:20</p> <p>continuing 86:7 208:17</p> <p>contract 9:17 10:20, 21,23 11:10,13,15 12:5,9,16,18,24,25 13:3,17 14:4,13 17:6 21:15 24:10 29:11, 18,22 30:2,12,14,19, 22 31:2 38:19 40:17 41:2,4 43:5,6,13,20 45:4 47:15,21 52:13, 22 53:3,4,8,13,20 55:11 59:15 62:6,18 64:15,25 65:10,12,20 67:3 69:14,24 70:2, 24 73:8,17 77:19 81:17 82:12 85:19 86:25 87:24 88:18 91:18 92:21 101:22, 23 104:21,24 108:23 112:8 113:15,22 131:12 134:21 135:5 137:22 139:6,11 140:17,22 141:8 142:9,11 143:9,17 144:3 147:10 148:4 151:8 154:7 165:25 172:25 173:5 174:18, 19 175:13,15,16,24 176:2,11,12,19,22,25 177:2,5 178:3 179:14 186:20 187:8,11 192:7,24 193:4,10,14 198:12 199:4,6,12,15</p>	<p>200:21,23 201:4,14, 17,19,23 202:10,22 203:5 204:3,17 205:5,6,11,14,16,17 206:4,14,20 207:11, 22,23 208:2,23 209:7,16 210:6,7 211:19,22 215:16 226:12,17,18,20 227:10,12 229:8 232:12 233:23 234:9 236:5,6 245:10,13 247:17 250:15 258:9, 19 264:11 269:2,5, 10,12,13,17,23 273:23,24 274:5,6, 14,17,20 275:4,7,22 276:6</p> <p>contractor 74:2 113:16 199:11</p> <p>contracts 77:5</p> <p>contractual 24:12</p> <p>contradict 274:11</p> <p>contradicts 274:7</p> <p>control 187:16</p> <p>conversation 47:6 62:8 66:25 67:18,21 72:12 89:22 110:19 114:24 115:8 116:13 161:17 173:23 238:9</p> <p>conversations 52:17, 20,25 79:7 81:13 89:3,20 103:4 115:10 116:8,16 126:25 138:9 161:10,14 187:19</p> <p>convey 181:20 206:8 227:5 265:15</p> <p>conveyed 68:7 265:13</p> <p>conveying 111:22 158:24 244:25</p> <p>convinced 227:8,16,17</p> <p>copied 163:11</p> <p>copies 239:4,6,8</p> <p>copy 143:21 146:3 237:3 277:8</p> <p>corner 59:18 112:4 158:16</p> <p>corporate 160:4,17</p> <p>corporation 5:3 6:25 7:4 8:24 9:9 10:14 25:11 142:8</p>	<p>correct 6:7,8 12:11 13:14,18,25 14:22 15:21 22:2 29:23 32:2,11 43:8,12 47:10,20 49:22,24,25 53:12,15,19 56:11 58:10,18,24 59:16,24 60:4 61:6,9 62:10 63:5 65:14,18 66:14 68:6 76:2 81:6 90:16 99:25 100:10 105:7 109:21 115:23 128:13 139:12,14 141:16 156:8 161:15 171:18 176:16 177:20,22 189:3,5 199:20 200:10 201:21 203:8 204:9,10 205:9 208:24 215:3,6,20 217:25 218:11 219:25 222:11 224:11 225:18 226:6 228:12 229:15 230:4,10 239:20,24 243:2 256:5,6 261:2 275:2 276:15</p> <p>Correction 221:3</p> <p>correctly 44:6 266:18</p> <p>correspondence 89:13</p> <p>corrupt 36:14</p> <p>corrupted 32:15,16, 20,21 34:20 267:9</p> <p>corruption 37:23</p> <p>cost 59:7 71:25 168:8,9</p> <p>counsel 272:15 277:7</p> <p>count 179:8</p> <p>counterclaim 4:20</p> <p>countries 78:11</p> <p>countries' 34:18</p> <p>country 33:2,4,6 55:18 78:9 181:24 192:6,14,16</p> <p>country's 191:24</p> <p>couple 90:10 101:14 105:25 148:13 181:2 236:16 237:14 256:12 261:19 265:24</p> <p>court 81:23</p> <p>courtesy 173:7</p> <p>covered 85:23</p> <p>crazy 108:13</p>
--	---	---

credibility 126:25 credited 199:13 201:3 211:18 crime 34:17 crimes 37:9 criminal 32:25 34:20 curious 130:5,6,8,10 current 31:4 customers 260:5	deal 129:11 debate 41:15 December 10:20 11:2 15:14 30:11 67:5 68:22,24 69:7 90:21, 22,24 114:14,19 119:18 124:12,15 178:25 181:7 214:24 215:2 226:12 233:21 decide 76:12,13 decided 177:21 204:18 decoration 253:24 decorations 252:22 defendant 4:19 131:7 166:5 defined 54:6 92:12 112:9 113:14 definition 18:21,22 80:2 81:2 87:6,17 88:2,16 229:3 258:22 definitions 87:21 delay 73:7 139:6,16 140:7 143:5,8,12 147:9 222:14,19 delayed 139:22 deliver 73:12,17 81:4 143:10,18 152:5 208:5 215:16 245:9 deliverable 60:11,18 73:5,7 78:5,13 79:9 113:11,13 151:3,7 209:17 deliverables 58:21 61:11 112:9 115:21 250:14 delivered 73:6 78:25 79:6,18 80:7 143:4 151:15 239:12,21,22, 23 245:11 249:5,6,13 delivering 215:18 delivery 71:9 149:3, 18 demand 168:19 democracy 37:24 38:6 107:2 258:15,24 Democrat 196:19 deposed 261:13 deposit 41:3 42:25 53:5,9,11 55:7,8 61:17,18,22,25 62:6, 10,16 63:4,23 64:5,	9,24 65:7 107:15,25 112:10 113:11,16 116:6,9,11,13 141:9, 19 159:22 162:15 163:23 164:14 171:22 174:3,17 198:10,11, 20 199:11,13,22,24 200:14,18,21,24 201:2 203:13,25 204:7,15,20 210:11, 12 211:5,13,17,20 deposition 4:23 7:22 8:2,6 20:18 21:14 23:12 31:18 91:8,13, 16 92:20 94:14 95:13,14 96:3,5,8,15 135:24 158:12 160:9 162:5 212:24 244:10 261:8,20 262:5 266:25 describe 54:23 121:13,15 describing 197:10 description 128:12 190:18,20 deserve 38:2 designating 31:17 designed 253:3 designee 94:15 desired 253:4 destroy 222:16 destroyed 222:15 detail 80:16 183:22 248:20 261:15 262:3 detailed 75:13 179:25 details 85:21 122:24 182:5 183:10,21 224:4 227:16 243:17 266:5 developing 253:2 device 236:25 238:2,3 devices 145:21 236:14 differ 75:18 difference 66:10 difficult 81:22 dinner 119:20 dinners 119:24 120:2 direct 214:5 directed 272:15 direction 195:13
<hr/> <p style="text-align: center;">D</p> <hr/>		
D.C. 104:10,11 106:25 107:5 118:10,13 123:2,7,15 124:5 126:8,17 127:10 129:21 130:9 132:23, 24 176:17 226:16 damage 268:10,24 damaged 268:4 damages 168:5,6 169:25 170:6,11 268:14,20 269:7 danger 131:24 dark 225:21 234:2 data 144:10 database 84:5 date 67:3,5 68:23 69:16 95:15 115:5 124:16 141:2 142:19 143:5,8,12 144:13 151:19 152:20 153:15 154:10 160:24 166:20,21 203:3 217:21 218:19 dated 136:2 dates 93:24 151:7 day 43:13 106:19 132:23 139:10,24 149:21 153:10,11,13 175:19 176:20 187:12 201:22 202:2,9 217:18 234:4,7 277:21 days 43:10 132:25 139:7 140:14,15 202:6,22 245:15 261:19 DBS 163:4,13,14 deadline 267:16,20		

directions 20:3
directly 68:2 152:14, 15
director 16:18 17:3 97:5 162:20
directors 16:14
disagree 115:4
disagreed 115:2
disagreement 116:20
disappointed 147:8, 12,23 150:10
disclosed 21:9
disclosure 19:24 20:2 34:17 48:21 183:21 230:7 267:9
discovered 198:5
discovery 93:9
discuss 12:23 21:12 62:14 64:2 78:19 80:11 84:20 86:20 87:4,5,6 94:7,17 102:25 111:9 113:25 120:3 125:19 130:18 137:22,24 164:12 175:23 176:8,9 184:10 215:15 216:19 233:22 234:8 246:5, 16 263:21,24 264:15
discussed 67:17 87:12 88:14,21 89:13 94:22 115:24 122:20 124:20 125:4 132:17 138:24 168:24 169:2 179:4,5 185:10 228:16 233:24 246:3 248:9 253:8 255:20 257:21 258:20
discusses 202:5
discussing 62:19 67:25 94:21 104:21, 23 124:25 157:19 255:9 269:13
discussion 21:11 71:21 81:16,18 82:6, 7 87:16 110:24 111:6 116:4,10 171:21 212:5,14 226:22 241:15 248:19 251:5, 20 255:2
discussions 87:25 125:18 163:21 185:13
dispatch 242:6

dispatched 241:24
dispute 240:23,24
disputes 240:18
dissident 134:2
dissidents 258:14
distracted 241:20
district 55:18
document 12:2 23:14 24:18 25:12,21,25 26:9 30:20 51:19,25 56:25 61:2 74:5 99:5,7 103:24 104:4 109:15 112:5 158:8, 20,23 159:4,6,11 162:9 164:23 167:14 179:10 185:6 199:3 213:7,20,21 215:11, 22 216:4 217:6 219:16 230:25 233:5, 13 235:10 240:14 252:11 254:14 263:17 265:8 269:22 273:10
documentation 45:8
documents 45:11,12,18 91:18 93:4 95:8,25 146:7
DOJ 156:16,20
dollar 55:7,8 62:10, 16 63:3,23 64:12 141:18 163:23 171:22 174:3 198:10,20 199:11,22 203:25 204:6,14,20 210:11, 12 211:5,13
dollars 40:21,25 44:15,21 46:25 57:7 65:17,24 107:15 162:15 171:14 172:2 173:18 174:5 200:12, 14 201:16 205:8,22 206:15,25 207:14,17 209:21,22
dot 163:13
dozen 146:5
draft 52:8 60:9 61:21 69:12 70:10 135:9 136:9,11,12 137:23 175:15,24 176:14 177:6,7,13,15 179:4 227:10,18
drafted 51:24 52:2,20 198:22

drafts 178:19
drive 79:5 80:7,9,12 81:8 83:13,18 86:4 123:12 128:10 130:11 133:25 145:18,20 152:4,21,24 153:17, 19 234:9,10,11 236:4,7,24 237:12, 17,24 238:11,13,19, 22 239:2
drives 81:4 143:25 239:11 276:5
driving 123:14 127:10 128:18 233:17
drove 123:13
due 140:17,22
duly 4:2
duties 97:7

E

e-mail 78:4,6 79:5,11 161:25 162:25 163:2, 12,13 195:11 220:19
E-V-E-R-M-A-Y 120:20
earlier 19:6,10 177:19 178:10 259:14 268:18 274:19
early 166:17,19 256:21
easier 89:6
east 4:11 119:2
Eastern 5:3 8:24 9:9 10:12,13,17 11:4,7 12:6,16,20 13:17 14:4,9,20,23 15:5,9, 19,23,25 16:11,13, 16,19,23 17:3,7,8, 13,16,23 18:7 24:12 25:10,16 26:4,25 27:10,13 28:4,7,14, 15 29:11,14,17,20, 24,25 30:4 32:10,12 36:8 41:9 43:25 44:9,14,22,25 46:19 51:15,16,23 59:10 60:2 63:14,15,17 72:23 83:20 84:4 85:15 87:11 91:21,24 92:8,15 94:3,5,7 95:13 96:9,14,19,20, 23 99:22 101:5,12,15

104:14,17,24 117:3,9 137:6,14 139:5 141:10,17 142:2,8,10 144:2 145:7 148:25 149:6 154:2,6 155:22 157:4,7 158:16 160:12 161:3 165:5 168:4,11,16,25 169:5,14,23 170:7,9, 13,19,25 175:9 179:16 180:2 182:11 185:16 194:12,23 196:22,25 198:9,12, 19 203:13 204:7 206:6 207:12 210:10 217:8 219:17 224:7 225:6 230:20 231:15 235:4 239:12 243:7 258:25 259:11,15,19, 22,25 260:4,7,18 261:12,25 262:10 266:22 267:23 268:4, 10,11,14,20 269:6 270:10,12 271:4 Eastern's 198:10 easy 219:5 eat 123:18 educate 91:8 94:3 96:9 253:14 educated 7:11 62:22 77:24 78:15,18 100:7 134:12 266:24 education 118:18 186:19 effect 111:17 eject 238:7 electronic 241:23 242:13 electronically 191:18 eliminate 207:10 eliminating 210:22 emphasize 71:18 emphasized 71:8,16 employed 16:16,22 18:14 employee 17:23 48:17 156:20 employees 17:22 18:7 21:22 22:4,11,16 employer 186:12 encompassed 6:22 59:7	encounter 121:13,16 encrypted 145:19 end 37:3 56:8 58:2 67:5 68:22 69:7 70:12 76:13 90:20 113:17 114:25 115:19 151:22 173:16 177:4 186:17 187:12 198:12 200:21 201:16 204:5 226:12 227:21 233:21,25 ended 59:14 215:18 engaged 133:6,19 engineer 78:12 English 39:18 60:17 198:23 enter 13:16 29:17 45:3 128:21 entered 82:17 165:24 entering 179:13 entities 21:20 entitle 269:2,6,14 entitled 51:14 86:9 141:18 250:5 entity 8:25 9:4 12:21 13:16 20:15 21:25 22:17,19 40:6 102:12,22 171:14 equipment 42:25 43:2 error 25:8 essence 266:11 essentially 207:11 209:15 estate 120:16 121:2 123:3,10 126:9,23 133:10 233:18 Estimate 105:20,21 Europe 148:23 events 93:14 evergreen 199:24 200:9,14,17,20 Evermay 120:20,21 123:4,9 126:10 127:11 128:14,22 everyone's 22:10 exact 85:24 96:18 142:18 250:15 examination 4:13 277:14 examined 4:4	examples 221:12 Excel 83:13,15,22 85:25 275:2 excess 126:21 exchange 85:3 235:12 240:16 273:12 excuse 157:10 205:21 212:8 260:2 264:4 excuses 273:18 274:3 execute 28:7 223:12 executed 17:6 26:11 43:7,8,14 64:16 136:13 139:11 193:11 223:8 275:15 executing 137:14 192:24 193:3 execution 14:3 69:13 78:21 103:5 117:17, 23 171:19 207:13 253:16,17 exhibit 7:16,22 8:3 11:18,21,25 12:10 23:4,8,12 26:20 51:7,10,14 56:14 59:18 77:20 85:20 97:12 103:9,13,16 107:14 109:13 134:20 135:17,20,24 137:13 141:6 158:5,8,12 160:6,9 161:25 162:5,12,15 164:23 165:3 167:2,5,9 199:6,8 204:4 211:14,16 212:8,9, 17,20,24 216:25 217:5 219:3,10,14 221:24 224:24 225:3 228:6 230:15,18 233:4,6,9 234:23,25 235:4 236:7,18,21 237:4,8 239:5 240:6, 9 241:17 244:3,7,10 252:6 254:10,13 255:16 258:5 263:2, 6,9 265:12 273:3,6, 25 274:2,13,14,16,17 275:5,9 276:7 exhibits 92:22 112:18 exist 91:24 92:16,17 existing 65:16 expect 172:15,16 175:3 206:6,13
---	--	--

221:18,22 250:4 256:13,21 expectation 188:7 193:17 204:24 expectations 247:16 257:7,14 expected 78:20,22 267:25 expecting 79:17 172:21,22 175:11 176:25 248:20 expense 272:7,22 expenses 270:20,22,24 271:5 experience 76:22,23 77:2,4 78:14 118:16, 19 134:6 186:12 256:8 257:15 264:16 experienced 118:12 134:13 181:12 183:12 expertly 241:19 explain 28:3,5 42:7 56:15 84:24 122:7 132:9 170:19 227:13, 15 245:3 246:19 261:24 273:17 275:10 explained 5:6 35:10 53:6,22 55:16 124:4 132:11 236:16 275:3 explaining 246:10 explanation 30:9 55:15 59:11 274:4 exploring 126:24 expose 133:5 extent 6:20,25 9:3 213:24 extra 241:5 242:18 extremely 147:7,22	102:7,9 110:21 113:7 128:14 192:8 206:24 267:3 271:19 false 198:15,16 familiar 8:25 9:3 40:7 156:16 201:13 210:18 216:10 family 10:5 18:17,18, 21,22,24 19:3,20,21, 23,25 32:24 49:24 50:18,25 51:4,5 118:17 119:3 182:11 family's 18:25 fashion 24:5 171:17 178:20 fault 150:7 fear 133:25 134:6,16, 17 173:11 February 57:5 58:8 136:3 149:20,22 151:19 166:17,18 202:3,24 203:2,8 211:8 222:22 fee 268:23 feel 61:23 70:16 132:12,21 134:16 135:14 186:17 feelings 110:6 fees 200:6 268:23 269:3,7,14,24 field 59:9 fighter 106:25 258:23 fighters 258:15 fighting 232:8,11 figure 256:19 271:22 file 146:6,9 217:16 236:10,19 237:4 filed 166:15,21 167:10 185:15 filled 52:21 53:2 final 56:5,10,12,20, 22 59:14 61:8 66:8 69:11,12,14 83:16 113:22 177:12 199:14 201:3,22 202:2,9 211:18 251:19 finalize 177:2 226:11 finally 14:8 57:23 139:21 143:19 finance 162:20	financial 31:3 82:9 83:4 187:18 188:6 205:14,19 206:16 221:25 find 50:10 107:25 166:2 191:3 219:5 finding 245:24 252:3 fine 81:24 107:21 204:18 208:16 209:18 266:4 finish 14:13,16 52:13 53:23 83:10 103:25 116:24 117:7 176:22 227:11 234:8 273:9, 11 275:8 finished 52:21 53:3 213:3 217:11 231:2 235:9,11 240:13,15 263:16,18 firm 125:21 157:8 firstly 245:9 fish 31:25 32:5 146:8,9 176:10 228:11 241:10,11,13 fix 40:18 flash 79:5 80:7,9,11 81:4,8 83:12,17 86:4 143:25 145:18,20 152:4,21,23 153:17, 19 236:4,24 237:12, 16,24 238:11,13,19, 22 239:2,11 276:5 flexible 228:18 flight 237:6 flip 213:2 fly 78:9 152:2,4 focus 190:8,11 Foley 137:5 155:24 156:7 202:21 205:21 folks 110:13 follow 33:23 37:14 155:24 190:15 191:3 195:7,10 follow-up 245:16 forensic 31:3 forget 195:5 form 12:13 13:6 15:12 24:7 28:21 39:4 41:19 42:10 47:18 48:2 61:13 63:6 78:25 79:3 80:5,17
<hr/>		
F		
<hr/>		
F-I-S-H 31:25 F.C.W. 59:21 face 78:6,11 152:3 fact 21:4,8 85:10 133:5 188:18 factual 122:9 167:17 fail 112:8 Failed 113:13 fair 13:21 14:21 55:3 65:13 69:4,5 75:16		

81:9 136:9,11,12 145:11 157:20 170:20 formal 185:11 format 83:23,25 84:2, 3 85:24,25 274:22,24 formula 228:17,24 229:2 forward 42:14 142:12 176:8 255:11 found 107:24 219:3 fourth 58:20 fraud 142:4 fraudulent 179:8 French 114:8 117:10, 18 120:7 179:21 180:17 225:12,14 226:10 227:23 232:18 235:15,16 265:14 frequency 60:14 frequently 123:18 fresh 78:18 friend 105:8 106:20 165:17 friends 18:25 105:16 front 8:7 51:17 56:23 132:8 134:9,15 136:4 158:13 162:7 167:12 177:12 185:12 189:22 225:10 230:21 234:14 235:6 238:5 263:12 frustrated 264:22 full 26:13 165:7,22 166:2 235:19 236:2 fully 253:19 fund 45:22 175:12 funds 44:25 future 28:19	gather 272:3 gathered 216:19 gave 11:10 14:14 63:22 93:8 147:10 152:20 202:22 236:6 Gee 89:3 general 19:7,10 31:9 74:4 75:13 115:14,16 117:14 240:22 243:22 generally 52:19 174:10 224:2 231:18 243:18 generated 51:25 gentleman 35:20 95:2 104:10 118:15 gigabyte 144:10 147:21 151:14 152:22 217:17,19,22 221:9, 15 gigabytes 217:24 219:23 221:18,21 222:6 give 5:11 30:8 70:13 82:23 85:11 142:18 152:5,7 156:23 165:23 176:12 200:11 206:14 giving 127:19 172:17 glad 268:7 God 257:23 Golden 18:15 19:14 20:4,7,11 21:22,25 22:21 23:24 24:2,11 25:10,16 28:9,15 29:10 36:3 46:6 48:5,11,12,14,15,18, 22,25 49:6,20,23 50:2,17,21 101:15 102:2,24 104:18 230:9 good 4:15 107:3 128:25 129:20 government 32:24 33:3 34:18 37:10 119:3 134:3 258:14 great 210:25 211:3,6 GRENDI 6:14 12:12 13:5,9,22 14:5 15:11 16:2 19:5,11,17,19 20:16 21:7 22:5,23 24:6,15,23 25:3,6 26:8,12 27:6 28:21,	25 29:5 31:15 32:17 33:12 34:7 35:5,18, 24 36:5,19 37:4,11 38:11,15 39:3 40:4 41:7,10,18,22 42:2, 6,13 45:20 46:8 47:18,25 48:13 49:4, 10,12 50:4,12 58:11 61:13 63:6 65:21 66:3 67:13 77:21 79:16 81:20 84:8 86:5 88:5 90:3 92:9 94:10,19 95:19 97:24 98:10,16,21 100:11, 18 101:9,17 102:6, 11,16 105:23 106:4 108:4,18 109:12 110:15 111:3,12 113:2,19 114:11 116:22 120:8 121:7 124:22 125:24 126:18,20 127:3,14, 20 131:6 132:18 133:20 136:22 137:15 138:2,7,12 140:18,23 141:14,20,25 149:4 150:14 151:5 154:11 155:6 156:23 157:22 164:4 167:20 170:23 172:19 174:2,4 177:9 183:18 186:25 188:20 189:6,14 191:5 192:9 193:12 194:15 196:8 200:7 201:24 202:11, 25 203:10,16 204:16, 22 206:22 207:3,18 208:7,12,18 211:24 212:4,11 213:22 214:17 220:25 224:9 230:6 238:23 242:21, 25 243:23 246:15 247:10 248:16 251:3, 8,22 253:18 255:13 256:24 257:11,18 259:17 260:9 262:8, 16,21 265:4,23 266:13 267:5,18 268:16 269:9,15 270:7,14 271:7,13,21 272:9,13,18 274:9,23 276:20,25 277:6,11 group 20:11 40:6 131:23 134:4,5 159:17,19 160:20
<hr/> G <hr/>		
G-A-R-E 137:11 G-U-O 10:3 gain 76:19 132:4 169:12 gained 77:3 garbage 73:13,15 74:17 147:25 221:8,9 222:15,18 Gare 137:11 178:9,11, 16		

<p>162:20 163:4 258:16 guaranteed 80:22 guess 35:11 63:13,14 87:16 90:18,21,25 106:8 107:12 110:3,4 113:4 114:8,9,18 117:8 131:20,22 135:8,11 160:24 170:3,4,5 237:10 guest 234:15 guidance 222:5 Guo 9:24 10:7,9,16 11:6 12:15 13:4,15, 21 14:16 15:22 17:13 20:3,6 22:19 29:20, 23 33:14,15 35:3,16, 23 36:13,16 37:8 39:8 44:5 46:11 47:4,8 48:7,11,23 49:2,6 50:3,23 52:6, 7,17 53:2 54:4,18 55:2,25 57:19 60:6, 16,24 61:3,12,21 62:2,20 64:3,6 68:7, 9,12 69:2 70:20,21 71:7,19,22 78:19 79:7 82:7,14,23,25 83:5 84:24 85:3 87:12,25 88:14,21,23 89:10 90:9,15 95:11 97:11 100:23 101:3 103:6 104:13,17 105:10,13,18 106:17, 19,22 107:10 108:3, 6,11 109:9,20 110:25 113:10,25 115:11 117:12,22 118:16 119:4,8,10,13,19,23 120:11,15,17,22,25 121:12,15 122:2,13, 18 123:2,5 125:5,12 126:13 127:5 128:7 129:25 134:17 136:24 139:2,19,22 140:4,11 142:2 147:4 149:11 153:7 154:14 157:18 163:25 165:21 166:9 173:22 176:24 178:2 181:11 182:17,22 193:19 194:4,9 213:13,14 214:15 215:5,21 216:2 222:13 226:8 227:4,</p>	<p>6,13 228:23 229:21 231:9 232:7,12,19 233:7 242:17 243:4, 6,19 251:12 253:11, 14,21 256:7,17 257:4 258:13 260:14 261:7 263:25 264:15,19 267:8 270:2 276:16, 22 Guo's 19:25 50:18 80:25 101:4 106:16 111:15 129:4 196:5 197:19 guy 109:17,20 156:16, 17 guys 51:23 58:3 62:14 67:19 115:20,24 123:19 130:18 131:14 171:15 204:12 253:24</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>H-A-N 26:17 35:21 165:11 H-I-G-G-E-N-S 156:25 H-O 9:23 H-O-A-G 137:5 habit 234:16 habits 272:4 half 247:20,21 Han 27:4,15 35:21 44:6 63:20 78:20 79:7 89:11,12 90:13 96:13 99:20 104:6 105:8,14,17 106:9, 23,24 107:4 112:22 113:9 114:2 119:25 120:14 123:7 165:11, 13,14 166:6 hand 7:25 11:24 12:16,18 51:13 52:7 78:5 103:15 135:23 160:8 162:4 212:7,23 217:4 219:13 225:2 230:17 238:10 240:8 244:9 263:8 273:5 handbook 196:5 handed 176:15 177:16 219:17 235:3 254:12 handing 23:11 158:11 165:2 167:8</p>	<p>handle 171:2 handwrite 196:3 handwriting 119:6 165:8,10 166:7 182:12 197:3,6,19 214:9,11 handwritten 81:11 164:23 Hank 26:13 happen 10:19 43:4 47:6 172:7 207:16 209:22,25 211:12 216:15 222:20 266:12 happened 12:22 67:22 69:10 73:21 75:7 93:10,15,18,20 115:6 122:5 143:11,19 151:16 159:14 172:8 191:4,7,12 199:21 216:18 236:25 237:8 239:4 happening 74:8 194:17 happy 25:13 209:2 head 218:13 221:13 hear 40:9,14 52:5 111:16,19,24 121:18 124:13 168:23 215:21 216:2,5,7 260:13 heard 12:20,21 15:5, 6,8,19 35:20 40:8, 18,22 43:24 45:22 46:2 47:3 52:2,4 62:21 79:10 105:7 111:14 118:13 126:2 164:17 168:21 188:24 193:16 216:12 222:13,23 232:7 251:13 260:11 hearing 186:22 187:3 heavily 67:8 held 212:5,14 helpful 81:15 84:18 85:12 helping 178:19 Hey 121:16 161:4 171:15 220:23 221:4 237:19 247:7 hidden 245:24 252:3 Higgins 156:9,11,14, 15,24 high 32:21,22 37:23 38:8,23 39:15,24</p>
---	---	--

<p>higher 58:4</p> <p>highly 32:14 134:22 135:2 179:24 181:16 184:7</p> <p>historical 31:3 75:17,21</p> <p>history 92:14 118:14</p> <p>hit 177:5 205:13</p> <p>Ho 9:21</p> <p>Hoag 137:5 155:24 156:7 202:21 205:21</p> <p>hold 94:19 95:19 98:16 138:3 208:7 211:24</p> <p>holding 220:7</p> <p>home 69:22 106:21</p> <p>Hon 162:17</p> <p>honest 20:22 129:15 130:4,10 171:23</p> <p>Hong 17:18,22 18:6,8 19:22 20:11,14 46:2 47:6 51:3</p> <p>hop 31:16 86:5 167:21</p> <p>hope 250:4</p> <p>hotel 234:10 271:2</p> <p>hours 55:17 56:2 95:7 123:12,14,16 125:2 127:9 128:10,19 130:11,16,17 133:24 176:5 233:24 234:11 257:24</p> <p>house 69:8,21 77:11 120:20,21,22 121:22 122:7,19 123:4,6,9 126:10 127:6,11 128:2,5,8,14,15,21, 22 129:12,16 130:15, 20 175:23 233:22,24</p> <p>huge 32:25 61:24 64:18 82:21 129:17 173:11</p> <p>human 32:7</p> <p>hungrily 38:3</p> <p>hurt 246:22 267:16,24</p> <p>hypothetical 210:18</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>I-N-S 157:2</p> <p>idea 28:6 44:14 91:25 106:6 122:12 125:10,</p>	<p>11 129:20 132:20 133:12 156:4 182:21 195:16 223:7,9,22 224:14,17 236:24 257:5,13 259:13,24 260:3 261:5,6 262:12,18 266:12 267:2 277:2</p> <p>identification 7:23 11:22 23:9 50:16 51:11 103:13 135:21 158:9 160:6 162:2 164:24 167:6 212:21 217:2 219:11 224:24 230:15 234:23 240:6 244:7 254:10 263:6 273:3</p> <p>identified 8:13 31:13 33:11,21 40:2 95:9 148:12 149:17 178:9 182:6,9 194:12 218:3,14,18 270:22</p> <p>identify 26:24 36:8 99:9 148:10 268:14</p> <p>identifying 32:9,13 194:6</p> <p>illegal 32:25 83:7 84:4 190:23 191:25 192:6,14</p> <p>immediacy 245:22 266:7,8</p> <p>immediately 82:25 265:3 266:8,10</p> <p>impasse 229:14</p> <p>important 5:15 84:23 118:20 187:13 196:4</p> <p>impression 172:17</p> <p>in-house 179:24 181:16 183:25 184:2, 8,9,11,12,19,20 185:2</p> <p>include 74:8 75:3 82:8 83:2 118:25 196:25</p> <p>included 53:8,10,13, 19 60:19 196:12 264:11,13</p> <p>includes 74:6</p> <p>including 37:15 53:11 78:10 118:22 194:22 253:15 269:7</p>	<p>incomplete 42:8 60:9</p> <p>inconvenience 65:8 174:15</p> <p>indicating 24:10 41:23 66:9 87:17 89:17 142:9 166:2 190:6 218:20 220:6,8 236:12 255:6 275:22</p> <p>individual 32:14 38:9 39:2 86:21 102:22 157:8 163:6 218:23</p> <p>individuals 33:21 35:4 36:9 37:9 38:17 50:22 77:16 133:7 156:3 195:8 218:2 221:5,7 231:11 240:19 276:13</p> <p>industry 55:21,22 78:2,16 80:22 181:14 250:25 251:6</p> <p>inform 117:16,18,22</p> <p>information 14:11,13, 15 30:17,18 33:16 34:15 50:8 73:5 74:15,17 75:11,12,13 76:9,10 78:23 79:23 80:20,23 81:9 82:20 83:3,25 84:4,14 85:22 86:19 97:22 100:5 109:10 119:14 120:5,25 122:3,9 135:4 136:19 154:3, 9,15,17,20 155:4 183:17 189:10 198:13 215:23 216:4,20 222:10,24 223:3,10, 11 224:6,16 236:7 238:18,21 246:12 249:17,19 254:17 255:3,5,7,15,17,21, 24 257:25 265:2 267:3,21,25 268:5 270:12</p> <p>informed 46:22 47:8</p> <p>initial 59:23</p> <p>initially 13:4,19</p> <p>initials 59:17,19</p> <p>input 136:15,17 243:12 265:18</p> <p>inquired 46:25</p> <p>inside 128:16</p>
---	--	--

insist 65:5 241:2 insisted 62:13 institutional 163:3 instruct 117:12 138:8 215:13 instructing 102:17 instruction 57:7 63:13 109:5 248:7,9 249:22,23 instructions 153:18 221:17,20 intelligence 185:9, 12,20 186:6,9 187:14 interest 25:7 internal 140:4,12 146:17 245:7 248:10 249:7 254:18 255:22, 23,25 internally 247:5 internationally 37:17 internet 145:17 interpreter 6:3,5 interrogatories 19:16 21:5 22:22 23:8 24:5 50:7 99:21 interrogatory 26:14, 21 97:19 interrupting 6:19 introduce 126:15 introduced 10:16 11:4,7 12:15 14:9 48:23 49:7 50:21 106:15,17 118:9 119:19 123:5 125:6 126:12 introducing 186:16 introduction 106:23 invest 259:4 investigate 55:19 191:2,23 investigated 30:25 40:2 investigating 34:13 investigation 30:15, 16 55:22 59:2 75:14 77:10 134:14 156:6 187:11 investigative 77:4 investigators 179:25 181:17	investing 260:22,24 investment 17:14 18:10 260:11,17 investments 18:12 30:7 259:22 260:16, 20 investor 258:18 259:7 investors 231:13,14, 17,24 232:3 258:8,21 invoice 200:3,4 involved 9:16 36:4 47:7 50:14 57:12 63:12,24 89:10 90:20 116:15,21 156:5 157:25 161:9,13,16 178:8,18 187:14 192:7 225:16 276:12 involvement 105:5 involving 276:23 issue 25:14 53:25 60:5 71:19 93:14 127:16 200:2 208:14 237:15 issued 209:5 issues 50:10 60:8 61:10,11,18 235:19 236:2 241:24 242:13 263:21 item 235:19,25 items 19:12 Iu 261:5	229:4 236:4,5 237:11 238:19,25 239:5,16 243:11,12 245:3,5,12 246:5,7,18 248:23 250:2 252:16 254:23, 25 255:18 264:12 265:14,17,18 267:25 268:2,6 273:17 Jing 162:25 job 134:10 210:25 211:3 Joe 4:18 Journal 37:16 39:7 justice 38:6 267:10
<hr/>		
K		
<hr/>		
K-W-O-K 9:23 key 80:9,12 keyboard 145:19 kick 176:4 226:13 killed 132:25 kind 17:13 25:17 30:18 42:4 43:3 64:25 75:19 76:7,23 78:2,17 94:11 98:13 115:7 118:10 120:21 122:8 124:3,8 129:8 176:21 181:24 182:5 190:17 192:15 193:9 206:24 211:11 238:8 255:24 259:20,23 kindergarten 252:21 kindly 65:6 knew 97:21 99:20 117:18,23 118:5 198:14 knowledge 7:6,13 77:12 97:13,16,17 98:8,25 99:6,11,12, 14,16 111:8 121:10 149:11 157:12,13,18 161:2,6 169:4 171:5 173:21 196:17 231:25 246:11 250:24 251:17,18 259:10 260:6 Kong 17:18,22 18:6,8 19:22 20:11,14 46:2 47:6 51:3 Kwok 9:19,21 131:20 134:2		
<hr/>		
J		
<hr/>		
J-I-N-G 162:25 Jamie 162:25 January 10:24 11:3 30:11 43:10,12 51:15 57:5 58:8 67:4,6 69:15 72:12 74:23 139:7,10,18 140:2 141:3,4 142:15,18, 20,21,22 143:13,16, 19 144:6,15 145:8,11 147:2 148:6 149:2,3, 13,14,15,16 151:2, 19,22,24 159:14 171:20 172:8,9,11 175:21,22 176:3 177:8,11,23 206:2 223:16,17 226:5,13, 15 227:20 228:5		

Kwok's 131:23 134:5	123:7 127:8 131:18 165:11,13,14 166:6 226:8 227:5,6,8,13, 17,24 231:9	143:16 176:5 246:13 253:13
<hr/> L <hr/>		long-term 253:3 258:8,12
L-I-A-N-C-H-A-O 35:21	Lianchao's 110:5	longer-term 245:24 252:3
L.C. 89:12 90:10,12 120:10 166:6	liar 142:4	looked 69:24 83:20 93:3 137:12 155:21 179:3 191:15 219:2
la 54:19 66:22 115:20	liberal 41:14	lose 186:18 253:22
lack 41:18	lighter 225:20	lot 33:23 39:8 41:16 61:22 78:18 118:12, 14 132:24 146:14 181:25 221:15 232:9 249:9
lady 118:14,15 134:10	likes 129:16	love 37:13 38:13
laid 209:23	limited 5:3 8:24 9:9 10:14 18:15 20:12 25:11 40:7 41:5 43:18,20 45:21 46:4, 7,12,15,20 47:23 63:3 92:12 142:8 159:17,19 160:21 162:21 163:4 169:3 171:8 259:5	lower 58:4 112:3 158:16
language 72:6 73:14 107:20 198:23 201:14 204:3 205:11 208:9	lines 47:2 79:2 89:20 111:10,17 117:20 121:23 127:2 148:5 182:25 184:25 255:12 256:14 258:2 261:14 276:14,18,23	luckily 231:4
laptop 145:14,16,18 146:22 249:10	list 8:12 19:12 36:14 212:20 213:11 214:16	lunch 119:20 120:2 155:11
large 246:9	listen 13:8	luncheon 155:12
late 106:14 152:18 178:25 242:7	litigation 51:24 93:5 238:14	<hr/> M <hr/>
law 37:24 38:6 107:2 258:16,24	live 27:19 129:2	Mac 236:9
laws 191:24	LLC 4:21	made 25:18 57:12 63:3 64:5 65:19 66:7,12 132:12 133:17 143:3 149:18 177:18 179:15 180:7,8,11,20,25 181:4 185:23 192:23 193:3 195:4 198:25 204:7 205:6 207:14 229:11 270:4
lawsuit 46:15 205:21	loan 43:24 44:2,4,7, 17 45:2,4,9,13,19 47:4,12 168:7,13,15, 17 169:2,6,16,24,25 170:14 262:18 268:22 269:25 270:6	main 61:15 66:18 71:16 116:3 264:10
lawyer 13:8 91:19 137:2,4 198:23	loaned 44:9	Mainland 19:21 33:7 37:25 51:2 107:8
lawyers 138:10	loans 262:14	maintain 54:16 59:2
lead 56:5	located 20:13 22:14 45:25 46:2 51:2	maintained 128:25
leader 194:24 197:21, 24	lock-in 54:24	major 114:13
learned 119:13	locked 128:10,11	make 18:20 21:19 26:15 38:22 39:17 60:23 67:23 131:2 198:6 203:12 260:7 264:5,6 265:16 266:16
leave 146:3 176:16,23	logic 245:18,22	makes 169:5 189:23
left 176:18,23 236:20	logical 253:3	making 29:7 160:19,23 264:4 273:18
legal 83:5 141:10 166:4 168:8 188:8,9, 11,16 191:25 192:6, 14,16 193:15 268:22 269:3,7,14,24	logistic 168:9	
legitimate 193:15	logistically 96:6	
length 115:24	logistics 96:6 268:23 270:17	
Lenovo 145:14	long 26:5 95:6 98:5 105:17 106:7 129:3	
letter 135:20 136:2, 18 139:5 141:6 155:20 156:7 166:22, 23 168:19 202:3,12, 19,21 203:3 205:22		
letters 81:10		
level 32:22,23		
Lianchao 35:21 89:12 90:13 104:6 105:13 119:25 120:4,14		

man 107:3	meaningful 148:2	249:11
manage 148:14	means 5:7 33:6 54:14	mention 172:4 173:15
management 45:22,23	57:16 73:12 74:15	264:18 265:5
248:11	85:10 89:9 140:25	mentioned 30:6 53:5
manager 14:10 24:9	184:12 190:16 199:24	80:19 86:22 101:13,
61:23 62:11 72:25	200:9,23 201:12	14 118:25 171:9,11,
73:9 74:7 75:5,15,25	221:8 229:2 247:2	25 183:7 228:15
76:18 77:8,13,15,18	252:7,13 274:3,15	261:19 264:2 272:17
78:12 84:19,21	meant 54:9 184:11	274:2,16 275:21
140:6,13 146:18	186:2,5,8 242:4	mentions 228:13
147:19 148:10,11,15,	274:20	275:16
18,19,22 152:3	mechanism 62:15 74:9	message 64:8,22 65:9
181:23 184:6 245:8	75:6,14 275:11	68:8,12 85:7,11
248:5,12 249:21	media 31:5 33:23	112:24 113:4 151:21
managing 77:11 261:4	35:8,9 37:14,16,17	174:9,25 206:3
Mandarin 6:3 61:5	77:11	220:21 227:4 233:10
219:4	meet 5:22 27:22 41:21	234:14 235:20 236:3,
mandatory 55:25 59:4,	57:12 78:11 82:13	4,22 237:8 242:13
13	94:2,6,13 95:6	245:15,16 252:10
March 57:5,11 58:3,9	106:11 119:19 147:18	253:12 254:16
211:9	152:3 153:7 226:2,9,	263:11,15,19 264:2
mark 158:4 161:21	16	265:10,12,14 274:8
164:19 166:25 212:8,	meeting 68:15 69:6,9,	275:9,25 276:7
16 216:22 224:19	18 90:17 91:2,4,10	messages 90:15
230:11 234:18 239:25	116:12 120:23 122:4,	103:12,19 224:23
244:2 262:25 272:23	6,11,21 125:13,20	225:5 230:14 234:22
marked 7:16,21 8:2	138:21 139:19,20,25	240:5,11 244:6 254:9
11:17,20,25 12:10	140:2,9 142:15,16	263:5 273:2
23:4,6,11 51:7,9,14	143:2 145:8,11 147:2	met 4:19 16:21,25
77:20 103:9,11,16	149:3 151:3,7,25	27:15,16 94:25 95:25
135:17,19,24 137:13	172:11 176:5,6	106:9 151:11 157:16
141:6 158:7,11	177:8,11,16 181:8	162:22 237:10
159:25 160:3,9	186:18 193:24 215:8	method 253:2
161:24 162:5 164:22	226:25 245:3,5,17	Michael 179:21 180:17
165:2 167:4,8 177:6	248:23 252:16 253:9	233:11 244:19 250:18
199:6 204:3 212:19,	254:23 255:2,19	275:9
24 213:5 216:24	273:17	mid 90:23,24 181:7
217:4 219:7,9,13	meetings 56:8 90:10	middle 119:2 182:10
224:22 225:3 230:13,	115:25 116:12 120:2,	194:23 196:22,25
18 234:21 235:3	5 124:20 125:22	252:9
240:4,9 244:5,9	126:3 134:11,16	Mike 62:3 78:8 86:21
254:6,8,12 263:4,9	149:12 178:19 185:25	88:15 89:11 90:8
272:25 273:5	195:6	105:9 110:3 117:10,
match 159:22 252:14	member 36:16,23 75:4	19,24 118:8,21
material 147:20	119:3	119:18 120:7,12
254:18	members 33:9	134:13 139:19,20
mathematic 202:14	memo 79:15,17,19	140:3,6 145:13
209:9	memorandum 79:15,20	146:14,15,19,25
matter 54:25 55:12	memorandums 81:10	151:25 152:2,13,16
161:3	memory 93:12 108:10	165:7,18,24 173:14
meaning 111:21 136:12	135:10 146:2,12,23	186:15 232:23,25
	216:18 246:20,25	233:2,3,11 248:11
		249:9 251:11

Mike's 165:22 Miles 9:15,18,19 55:25 131:19,20,23 134:2,5,17 196:5 233:7 milestone 267:15 million 40:16,20,24 44:15,21 46:25 55:7, 8 58:22 61:22 62:6, 7,10,16 63:3,23 64:9,12 65:7,17,24 67:24 107:15 141:18 162:14 163:22 171:10,14,21 172:2, 14,25 173:4,15,18 174:3,5,14,17 198:10,20 199:12,17, 22,25 200:12,13 201:16 203:24 204:6, 14,20,25 205:8,12, 16,22 206:15,25 207:13,17 209:21,22 210:10,12 211:4,13 215:22 216:3 258:19 mind 6:11 49:15 mine 59:20 minimum 59:5 minutes 150:21,24 203:17 236:16 262:20 miscommunication 6:2 148:15 247:4 248:5 misrepresentation 179:8 missed 222:9 267:15 mistake 25:17 40:18 43:3 64:18 140:12 143:3 150:8 205:15 249:8 misunderstanding 94:12 140:5 247:4,8, 15 misunderstood 248:6 mixed 110:6 moment 4:19 69:10 103:21 230:23 240:12 Monday 176:18 234:4 money 41:6 43:19 44:9,11 47:5,9,14,23 54:14,16,24 55:14 61:25 64:16 67:20 82:21,23,24 83:7,8 108:12 109:2 140:21	169:8,10,14,15,17 170:21 171:7,13 173:2,9 194:5,11 203:14 206:5,7,19 207:22 208:3 210:9 259:8 260:7 monies 164:18 month 55:12 57:18,25 58:16,23 71:10,12,14 73:20,21 74:22,24 75:7,9,10 76:6,7,13 141:2 143:10 145:3 199:14 200:3,18 203:6,7 209:20 211:19 214:25 241:5, 9,12 274:5 monthly 71:13 73:20 200:6 245:10 months 57:4,18,25 58:2,7,23 66:16 70:3,13,15 75:22 76:5 201:4 207:12,16 208:3 209:7,12 211:4,7 months' 223:14 morning 4:15,22 6:9 203:12 mouth 111:15 184:4 250:16,17 move 82:24 142:12 <hr/> N <hr/> named 182:2 names 9:20 38:17 182:12 216:20 napkin 166:8 197:10 nature 130:25 131:12 134:21 149:24 150:3, 5 167:25 240:23 necessarily 42:15 needed 154:2 222:10 223:11,12,18,23 249:19 265:2 267:3 275:4 negotiate 12:24 56:3 187:8 negotiated 21:16 negotiating 13:3,20 negotiation 65:5 137:7 226:21	negotiations 56:4 103:5 178:13 neighbor 128:23 129:17 nervous 146:15 newspaper 156:19 nice 55:24 nonlegal 188:9 nonsense 73:15 Notary 4:3 277:24 notebook 119:5 196:5 197:19 noted 45:20 notes 81:11 notice 7:22 8:5 141:13 202:6,23 203:6 204:14 209:5 November 90:18,19,23 106:14 119:17 124:21 125:15,22 number 26:22 60:2 85:20 99:24 100:22, 24 109:14 112:3 165:5 199:8,10 211:14,16,17 214:10 217:8 228:6 233:9 236:8,18,22 237:4 244:12 265:12 273:25 274:2,13,14 275:9 numbers 158:15 202:18 212:10 213:4 225:6 NY 233:10 <hr/> O <hr/> oath 155:18 object 24:7 97:25 101:6 105:22 133:8 142:7 155:5 164:9 194:7,14 213:18 214:2 215:25 232:15 242:20,24 246:14,24 248:22 251:2,21 256:23 257:10,19 261:22 264:8,23 272:16 objecting 98:10 objection 6:16 12:12 13:5,22,24 14:5 15:11 16:3,10 19:5, 7,10 20:16 22:5,23
---	--	---

24:15 27:6 28:21,25 29:7 31:15 32:17 33:12 34:7 35:5,13, 17,18,24 36:5,19,21 37:4,11 38:11 39:3 40:4 41:7,10,13 46:8 47:18,25 48:13 49:4, 10 50:4 58:11 61:13 63:6,19 65:21 66:3 67:13 77:21 79:16 81:20 88:5 90:3 92:9 98:17 100:11,18 101:9,17 102:6,10 105:23 106:3,4 108:4,18 109:11,12 110:15,17 111:2,3,12 112:23 113:2,19 114:11 116:22 120:8 121:7 124:22 125:24 126:18,19 127:14 129:13 132:18 133:20 136:22 137:15 138:2 140:18,23 141:14,20, 23 149:4 150:14,15 151:5 154:11,24 155:6 157:22 158:3 164:4 170:23 172:19 174:2,4 177:9 183:18 186:25 188:20,21 189:6 191:5 192:9 193:12 194:15 196:8 200:7 201:24 202:11, 25 203:10 204:16,22 206:22 207:18 214:6, 17 220:25 223:13,20 224:9 230:6 238:23 242:21,25 243:23 246:15 247:10 248:16 251:3,8,9,22 253:18 255:13 256:24 257:11,18 258:3 259:17 260:9 262:7, 8,16 265:4,23 266:13 267:5,17,18 268:16 269:8,9,15 270:7,14 271:6,7,12,13 272:9, 13 274:9,23 276:19, 20,24,25	occurring 262:5 October 90:19 106:14 124:20 125:15,22 odd 130:2 172:18 offense 92:11 offer 95:22 140:13 149:21 offered 88:24 140:10 234:6,9 237:7 239:3 245:15 office 17:19 18:17, 18,21,22 22:12,14 49:24 50:18 officer 16:18 17:3 97:5 185:12,20 186:6,9 187:14 officers 185:9 official 32:22,23,24 34:20 37:23 38:9,23 39:15,24 97:4 101:21 119:3 141:12 182:10 267:9 officially 43:2 44:18 140:8 141:8 officials 119:2 one-third 199:14 201:4 211:19 open 146:9 236:10,24 237:11,14,25 238:4 239:2 opened 238:5 operating 250:24 251:6 operational 251:14 opportunity 222:9 opposed 39:21,22 41:9 74:19 142:11 Opposition 194:24 197:22,24 orally 61:4 order 14:16 59:9 63:22 94:3 155:4 223:12 226:12 241:19 246:12 261:8 270:13 277:8 orders 63:8,10 original 207:8 originally 107:4,6 207:9 outrage 37:22,25	outset 31:21 owe 200:6 owed 198:12 206:15 207:15 208:4 209:8 210:2,8 211:21 owner 132:10 owner's 234:16
		<hr/> P <hr/>
		p.m. 152:19 277:14 pace 127:21 packet 214:16 pages 146:5 264:9 paid 54:16 55:14 58:14 64:9,17 65:17 66:17 102:5 141:2 168:17 169:10 173:18 200:12 206:5,8,19 209:20 211:4 215:22 216:3 paper 63:20 93:11 96:21 197:10,12 papers 93:2 paragraph 57:3 58:20 73:24 139:5 168:3 179:13 198:8,13 203:25 part 6:21 59:6 70:4 71:2 74:11 109:7 183:24 211:9 235:22 246:9 participated 90:2 parties 50:13 57:4, 10,12 134:20 135:2 partner 18:25 137:9 parts 61:15 party 9:10,14,17 11:9,12,14 12:8 14:3 33:9 36:17,24 37:3 154:23 194:24 197:22,25 232:9 password 191:11 past 28:20 194:22 195:20 196:25 patience 186:18 253:22 patient 150:9 pay 44:15 54:20 55:2, 11 57:25 58:4 59:5 61:25 66:24 70:15
objections 13:13 23:7 41:16 objective 128:19 occasions 180:22 occurred 91:9		

111:23 115:20 169:6, 8,18 173:19 199:10 200:4,15,18 203:13, 14 206:7 211:6,7,21 258:9,18 268:22 payback 44:18 paycheck 102:13,22 paychecks 102:4 payment 29:12,13 53:12 57:6 148:4 174:20 177:4 199:18 207:11 270:3 payments 57:11 198:11 204:8 205:7 207:14 pays 102:12 207:13 PDF 83:23 85:25 146:6 236:10,19 275:2 Penn 151:16 217:20 people 10:6 31:10,12, 13,24 32:7,15 33:3, 8,11 34:6,14,16 36:14 37:22 38:2 39:25 62:4 78:15 82:18 110:20 119:4, 25 124:5,7 126:15 131:23 134:4,5 137:5 162:17 163:10,14 170:17 173:9 175:12 182:11 184:12,13,16, 18,22,23 189:21 194:6,12 218:21 220:10,15 221:11 222:8 229:16,22 230:2 232:8,10 242:6,7 245:24 252:3 253:12 257:25 258:16,22,23 people's 113:4 percent 74:11,12,13 145:9 250:11,19,20 perfectly 20:22 208:16 performance 208:23 209:6 210:15,17,24 performed 205:6 207:25 period 205:7 permit 55:17 person 9:15 39:21 79:5 81:5 147:19 156:12,14 163:3,17 165:13 181:9	personal 7:13 72:20 97:13,15,17 98:8,25 99:6,10,12,14,15 102:15 173:10 personally 97:21 131:25 143:24 152:23 168:20 182:16 183:2 195:21 196:10 persuade 234:7 peruses 30:20 56:25 74:5 99:5,7 103:24 104:4 109:15 112:5 159:6 179:10 185:6 199:3 217:6 219:16 230:25 233:5,13 235:10 240:14 252:11 254:14 263:17 265:8 269:22 273:10 phone 16:22 17:2 70:19 71:7 72:7 78:6 79:12 115:25 139:2 189:22 190:3 220:19 261:18 phones 190:5 photo 132:2 218:19 photographs 131:14 phrase 134:25 phrases 266:15 physically 83:19 191:20 pick 70:18 147:19 152:3 239:4 picture 123:21 place 69:20 90:2,5 125:21 152:20 168:22 193:16 plaintiff 4:20 5:2 8:6 20:24 21:2,6 plan 154:15 175:25 222:13,14,25 223:7, 12,18 224:5,8,12 243:11,19,21 265:17, 21 266:5 267:2,8,11 planned 222:23 plans 267:16 plants 31:11 plugged 83:19 236:8 plural 39:22 point 13:15 14:2 15:4 44:20 56:23 58:24 71:16 86:2 97:14	98:7 150:16 175:17 179:3 186:21 187:2 188:17,24 202:5 207:4 210:23 211:13 214:25 220:23 227:19 229:11 269:20 pointed 61:21 62:12 pointing 58:24 87:19 points 71:22 115:18 245:14 polite 129:24 130:3 politicians 194:23 196:13 pop 7:6 83:21 94:10 95:20 portfolio 261:3 portion 42:21 88:11 138:18 portions 31:17 position 69:3 96:18 182:4 possibly 82:8 141:23 232:14 post 37:15 39:7 68:8 potential 166:5 potentially 38:18 power 25:11,24 28:7 86:2 92:13 practical 55:4 pre 117:17 177:16 preceding 178:12 precise 67:23 precisely 110:18 275:3 276:8 preference 190:3 preliminary 71:11 74:18,21,25 75:8,20 223:15 preparation 91:7,12 94:23 95:14 prepare 91:15,21 92:19 94:13 261:9 prepared 8:20 16:5 52:8 presence 129:7 185:10 present 4:10 69:18 89:2 95:4 119:23 120:23 138:20 175:16 252:22 presentation 146:13, 19
--	--	--

January 31, 2019

20

presented 80:21 120:2 139:21 145:10,16,20 249:25 251:11	Profit 5:3 8:24 9:9 10:12,13,17 11:4,7 12:6,16,20 13:17 14:4,9,20,24 15:5,9, 20,23,25 16:11,13, 16,19,23 17:4,7,8, 13,16,23 18:8 24:13 25:10,16 26:4 27:13 28:4,8,14,15 29:14, 17,20 30:4 32:10,12 36:8 41:9 43:25 44:9,14,22,25 46:19 59:10 83:20 85:15 87:11 91:21,24 92:8 94:4,5,7 95:14 96:10 99:22 101:5,15 104:14,24 117:3,9 137:6,14 141:17 142:8,10 144:3 145:8 148:25 154:2,6 155:22 157:4,7 161:3 168:16,25 169:6 170:7,13,19 175:9 185:16 194:13 203:13 204:7 206:6 207:12 210:10 224:7 239:12 259:2,15,19,22,25 260:4,7,18 261:13 262:2,10 266:22 267:23 268:4,11,14, 20 269:7 270:10,13 271:4	19,24,25 125:8 130:19,20,21 131:2, 4,9,10 132:16,21 133:10,11,13 134:7,9 135:5 140:6,13 146:18 147:19 148:9, 11,14,18,19,22 150:7,12 152:2 159:21 165:25 171:2 173:6 174:11,13 176:4,22 181:8,23 184:6 185:25 186:20 195:6 200:24 215:12 226:13 229:23,25 231:18,20 245:8 248:5,12 249:20 253:3,25 256:4,22 258:8,12 259:9 276:12,17,23
president 23:21 24:2 39:9 96:20		projects 18:24 77:9 156:6 256:9
pretty 41:14 118:24		promise 169:14
previous 118:18 186:11		prong 155:23
price 53:6,9 54:24		proof 88:25 159:11
pricing 58:21 110:25		proper 205:19
prince 194:23 197:2, 15		properly 238:8
prince's 197:13		properties 245:25 252:4
princes 196:22		property 120:16 128:20 130:13 133:9
principal 27:9 96:14, 22,23 97:10 99:21 100:2		proposal 227:2
principals 26:24 27:13		prorated 199:13 201:3,9,10,11 211:18
prior 14:2 40:20 67:11,17 78:21 99:20 117:22 125:5 136:13 137:14 144:15 145:8 179:13 192:24 193:3 257:15	Profit's 168:12 169:23 170:9 198:19	provide 28:9,15 37:19 44:24 112:9 113:13 136:15 145:2,4 167:17 246:12
private 118:17	Profits 169:15 231:15	provided 7:12 55:13 60:15 61:3 93:7 136:17,19 144:2,11, 15,19,23 146:7 222:4 238:18,22
problem 69:9 140:5,13 146:17 150:8 236:19 237:15 238:6 242:8,9 245:7 248:10	progress 73:22,23 74:3,4,6,12,13,19 75:20	Proving 159:12,13
problems 21:12 238:16	project 9:12,16 14:10,12,16 24:9 35:16,23 36:4 40:10, 15 54:12 56:2 59:4 61:23 62:11 65:3 68:16 69:6 71:5,21 72:25 73:9 74:7 75:2,4,15,25 76:18 77:8,10,12,13,15,18 78:8,12,17 84:18,21 89:8,10 90:11 91:5 92:13 93:21 103:2 105:6 110:22 111:5 113:11 118:21 120:14,17 124:12,13,	provisions 71:6
procedure 205:19 206:17 250:25 251:6		public 4:3 35:10 267:11 277:24
proceed 76:14 207:5		pull 56:12 107:22 108:22 163:22 164:13 174:22 241:19
proceeding 178:12		pulled 164:2,3 165:20
proceedings 178:9		purchase 126:14
process 52:16 63:25 93:9 236:13 253:11, 21		
produce 25:13,20 54:13 74:2 253:4		
produced 45:19 47:21 51:22,23 93:4,6 165:20		
production 59:25 109:14 112:3 158:15 165:5 212:9 213:3 214:10 217:8 225:6 228:6 244:12		
professional 59:12 78:15 192:22 205:18		

<p>purpose 30:13 141:5,7</p> <p>purposes 240:20 272:6</p> <p>pursuant 30:25 43:19</p> <p>put 6:15 14:4 29:21 31:19 38:17 70:10 112:7 123:20 132:7, 11 214:6 234:16 251:13 259:11 267:23</p> <p>putting 77:14 116:16 250:23 259:8</p> <p>Pyratz 244:18</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualifiers 221:17 222:5</p> <p>quality 73:10,12</p> <p>quarter 76:15</p> <p>question 5:16,19 8:23 18:4 21:24 22:25 30:21 31:8 32:19 34:10 35:2,13 37:13 39:13 42:5,7,19 43:17 48:8,9 49:8, 13,15,19 52:24 63:9 67:15 68:18 77:17 78:17 79:4 84:10 85:13 88:7,13 98:9, 15,20,24 99:9,23 100:4 101:19 102:8, 9,20 107:13 116:24 117:7,21 121:14 125:3 131:16 136:10 141:24 144:21 154:5 156:13 161:12 165:6 172:22 180:10 184:21 186:4,24 188:23 192:11 193:2 194:8 197:14 198:6 202:15 206:24 207:8,9,21 209:9,24 210:23 214:13 218:15 221:19 237:22 247:12 251:4 257:12 265:22 266:20 268:3 271:20 276:21</p> <p>questionable 41:17</p> <p>questioning 83:10 84:23 86:8 150:18 167:24 213:19 214:3</p> <p>questions 5:11 6:21 7:2 95:16,21 100:15 103:23 190:9 207:7</p>	<p>211:25</p> <p>quickly 143:22 146:22 219:2</p> <p>quote 86:19 88:3</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raise 60:8 61:18 189:8 220:11</p> <p>raised 60:6 61:12 125:9 172:11,20</p> <p>raising 189:11,18</p> <p>raw 147:20</p> <p>react 98:20 175:3</p> <p>reaction 64:11 69:17 72:9 129:4 134:10 175:5 193:23 261:21 264:3 273:14</p> <p>read 39:10 42:18,21 60:17 61:7 82:4 87:17 88:8,11 98:8, 11 113:7,8 138:18 185:4 213:21 219:5 235:22,23 244:17 263:15</p> <p>ready 8:22 103:22 179:25 258:8,12</p> <p>real 85:2,6,7,8,9,10 106:25 120:16 121:2 123:3,10 126:8,23 133:10 150:11 151:9 233:17 258:15,23</p> <p>realistic 248:21</p> <p>realized 126:20 176:24 249:12</p> <p>reason 55:15 72:22 75:9 92:17 125:16 132:8 164:7 195:17 196:6,15,24 197:8, 15,22 218:24 273:19</p> <p>reasonable 55:24</p> <p>reasoning 164:13</p> <p>reasons 6:11 204:19 209:6</p> <p>recall 15:18 17:12 26:3 114:20 115:10 235:12 240:18,22 273:12</p> <p>recap 57:9,13,23 58:3 66:17 70:2,4,12,14, 25 76:12 178:3</p>	<p>228:13</p> <p>recapping 177:20</p> <p>receipt 64:6,7,11,12 108:6 174:7</p> <p>receipts 271:17,24,25 272:5,8</p> <p>receive 78:12 80:23 83:18 141:18 168:20 263:19</p> <p>received 66:13 67:12, 18 217:19,21 236:18</p> <p>recess 25:4 86:14 155:12 203:19 262:23</p> <p>recipient 162:24</p> <p>recognize 4:23 12:2 23:14 92:4 157:3 158:20 162:9 219:20 240:16</p> <p>recollection 26:18 93:19 116:7 161:19 255:9</p> <p>recommend 266:14</p> <p>record 4:8,16 6:16 11:16 13:13 21:11 24:19 25:7 26:11,16 27:5 29:8 31:19 38:20 164:14 168:14 189:12 199:7 203:22 208:8,11 212:2,6,12, 15 214:7 244:18 270:2</p> <p>Recorded 81:13</p> <p>records 91:21,23 92:7,14 151:24</p> <p>reduced 62:7</p> <p>refer 10:6 229:24 235:21 243:18</p> <p>reference 55:6 109:20 143:13 182:3 230:3 232:19 233:15,16,20 243:3</p> <p>referred 9:13 49:23 155:23 168:13</p> <p>referring 9:18 10:10, 13 11:13 12:9 19:4 33:5 38:10,25 39:2, 11,25 73:24 137:4 179:20 199:5 225:13 228:24 232:18 234:15 235:17 241:7 243:15 245:19 254:22 255:18 258:17</p>
--	---	--

refers 228:23 231:10 236:3 241:14 253:10 255:22 258:19	17 217:20 218:23,25 221:2,3,14 224:4 238:2,7 241:8 247:2 249:8,20 250:19 251:10,23,24 256:10 258:4 277:4	272:25 277:7
reflect 189:13	remind 16:2 61:24	reports 54:13,20,21, 22,25 55:12 57:11 60:11,14,18 66:23 71:14 72:4,8,15 74:6 78:5,20,22 79:25 81:5 85:21 143:25 223:14,17 224:2,3 241:10,11,13 243:20 245:10 257:8 272:8 275:4,14,16,20,21 276:4,13,23
reflected 56:10,14,24	reminded 61:19	represent 4:19 10:23 92:12 137:6 197:24 216:12
reflection 42:16	remotely 77:19	representation 83:14 180:7 181:4 185:8 195:4 198:25
refresh 93:12,19 116:7 161:18 249:10	renegotiate 226:17,18	representations 179:15 180:20 185:22 193:8
refunded 210:13	repay 169:15	representative 5:2,8 92:6 145:7 170:10 261:14,25
refuse 102:14	repeat 77:17 88:7 138:16 146:9 209:24 215:24 250:20	representatives 123:3 179:14,19 194:9
refused 82:25 182:3 183:9 193:18	repeatedly 55:23 146:16 181:10 253:14	represented 194:21 195:19
regime 232:8,11	repeating 187:5	representing 92:3
regular 272:4	replacements 239:22	Republican 194:22 196:12,19
related 83:3 134:7,22 135:4 241:8 268:23	replied 266:2 268:9	request 12:24 14:12, 15 18:9 32:4 45:20 53:6 54:25 59:13 60:23 66:2,22 68:8 70:8,14 71:15 80:25 83:4 118:2 135:7,11 160:5,18,19,23 193:15 222:2 248:6,8
relationship 21:9 25:9,15 28:4 101:4 105:13 133:24 262:13 274:15	reply 220:16 268:10	requested 42:20 45:10 54:15 55:10,13 57:18 65:19 66:5,19,22 70:5 84:4 86:6 88:10,23 114:21 120:25 121:3 122:2 138:17 151:8 224:16 237:3 245:10,12
relationships 24:12	report 35:3 71:9,10, 11,13,18,24 72:17, 19,24 73:2,6,7,17, 19,20,22,23 74:3,4, 12,14,18,19,20,21, 23,25 75:8,18,19,20, 22 76:5,6 79:9,13, 14,22,24 80:2,4,6, 15,17 82:8 83:2,12, 16,17 128:7 129:5 139:21 140:7 143:11, 18 144:9 145:3,15, 21,23 146:4 209:17 216:25 217:7,23 218:10 219:10 223:15 243:10 245:11,12 249:13,16,24,25 250:2 251:17,19 254:17 265:16 274:20,22 275:12	required 180:2
relevance 50:5	reported 34:22 39:7 76:11 238:17 239:8 255:8	research 11:21 18:9 31:4,5 34:22 38:19 42:25 43:2 51:10,14 54:17 71:14 75:18,21
relevant 193:10	reporter 4:6 7:21 11:20 23:6 42:21 51:9 81:23 88:11 103:11 135:19 138:18 158:7 160:3 161:24 164:22 167:4 212:19 216:24 219:9 224:22 230:13 234:21 240:4 244:5 254:8 263:4	
reliable 62:5 73:3		
relocate 126:17		
rely 188:18		
remain 213:5		
remained 228:18		
remains 58:22		
remember 12:22 14:7, 25 15:6,24 26:5,7 30:6,10 44:5 54:2 56:7 61:20 62:2,8, 23,24 64:23 65:9 68:23 69:5,25 72:7 78:3 80:19 82:9 93:13,24 113:21 114:22,23,24 115:3, 5,6,7,9,13,14 116:11 118:11 120:10,18 121:24 124:8,16 142:15 143:9 144:12 145:15 146:4,14,21 151:14,20,23 152:13 153:15 154:13,14 155:17 166:7,13,20, 24 174:17,23 177:25 178:24,25 181:5 183:23,24 185:3 187:19 194:16,17 214:23 216:9,14,15,		

77:16 87:22 117:3,9 130:19 133:6,11 134:14 156:2,3,6 157:9 180:2 192:2 220:3 221:25 222:2 232:13 240:19 246:11 250:22 256:9 257:17 276:13 researched 31:10,11, 14 32:9,13 218:18 researching 34:5 reside 27:17,20 resides 27:24 148:22 resources 84:5 118:12 respect 61:18 68:4 181:15 190:13 234:16 269:25 respectful 62:3 response 110:12 172:10 220:22 254:3 responses 23:7 26:14 97:19,23 responsibilities 97:8 rest 74:13 restate 19:6 result 168:4 results 245:23,24 252:3 253:4 retain 157:8 retainer 200:15 retract 164:17 retroactively 31:22 return 65:6 112:10 113:16 141:9 174:13 175:12 200:24 201:15 205:4,8 206:3 returned 205:17,23 reveal 138:4,9 183:16 revealing 167:22 review 20:3 30:19 52:12,16 53:4,23 85:19 103:22 104:3 144:14 152:23 214:2 reviewed 8:16 53:21 95:8,24 143:24 reviewing 217:11 revise 53:24 177:15 revised 177:13 Rich 156:9,10,11,14, 15	right-hand 60:3 112:3 158:16 ring 253:7 risk 131:24 road 6:18 83:11 246:23 roll 138:13 room 6:3 131:21 138:24 roughly 92:25 royal 119:3 182:11 rude 49:18 rule 37:24 38:6 258:15,23 rules 107:2 rushing 246:22 Russian 73:14 119:2 182:10 194:24 197:21,24 <hr/> S <hr/> S-H-I 163:11 sake 208:21 210:22 sat 256:11 Saturday 176:6 234:5 save 22:10 scenario 209:23 210:11 schedule 60:19 71:9 73:8 176:17 234:4 Schmit 4:14,18 7:8, 15,24 11:16,23 16:8 19:9,14 20:20 21:17, 21 23:3,10 24:21,25 25:23 26:10,19 38:21 41:12,20,25 42:4,9, 18 45:17 48:15 49:14 50:6,15 51:6,12 81:24 84:11 86:11,16 88:8 98:4,13,19 102:7 103:8,14 126:24 127:18 135:16,22 138:5,15 141:22 150:20,25 155:10,14 156:25 158:4,10 159:24 160:7 161:21 162:3 164:19,25 166:25 167:7 189:11,15 190:2,8,12 203:18,21	206:23 208:10,15,19 212:2,13,16,22 214:8 216:22 217:3 219:6, 12 224:19,25 230:11, 16 234:18,24 239:25 240:7 244:2,8 254:5, 11 262:19,25 263:7 271:19,23 272:20 273:4 277:5 scope 19:11 112:10 113:12,14 screen 83:20 103:12, 19 146:22,23 191:10 224:23 230:14 234:22 240:5 244:6 254:9 263:5 273:2 screwed 247:24,25 scrolled 236:17 search 118:2 seat 123:20 132:8 234:13,14 sell 120:16,22 130:13 send 41:5 43:18 64:6, 8 174:7,21 229:7 sending 159:16,19 sense 77:13 115:15,16 131:2 133:17 135:15 169:7,17,20 173:7 188:11 192:17,19,20, 21,22 243:22 247:14 264:5,7 266:6 sensitive 222:20 sentence 201:19 202:4 247:21,22 250:12 252:8 258:11 separate 180:22 separated 134:18 Serena 162:17 series 5:10 103:18 225:5 240:11 seriousness 65:2 174:24 served 182:2 service 28:9,11,12 30:15 set 6:10 setting 210:21 shaded 225:20 shape 80:5 157:20 170:20
--	--	---

shared 109:9	264:11 273:23,24	speaks 20:15 61:5
shareholders 258:25	274:5,17 275:22	202:12
sheet 197:9	significant 118:23	special 122:23
sheets 83:13	181:25	specific 83:24 89:19
Shi 163:11,12	signifying 158:25	227:2 274:21
shocked 64:13,14	signing 70:18 199:12	specifically 4:25
173:10 193:18	229:5	108:21 109:4 132:7,
short 54:13 155:21	signs 102:4	11 142:10 181:15
180:2	silly 131:10	183:25 185:19 187:10
short-circuit 245:22	similar 120:11 156:21	220:23 221:6 223:5
shortly 11:3 25:21	221:9	249:4
shot 103:12 191:11	simple 165:6	spell 9:22 10:2
224:23 230:14 234:22	simply 140:16	spelled 27:5
240:5 244:6 254:9	simultaneously 177:3	spelling 156:24
263:5 273:2	single 51:4	spent 56:2 253:12
shots 103:19	singular 39:15,16,19,	spies 124:7
show 56:13 119:4	20	spirit 264:10
129:8,9 134:9 143:22	sir 266:2	spoke 37:21 151:11
173:9 191:10,11	sitting 15:7 133:16,	spoken 16:21,25 46:3
274:3 275:14	21 146:20 209:20	96:2 163:5,15 178:23
showed 65:24 121:4	268:13 270:11	227:24
171:7,13	situation 174:19	spread 83:13
showing 122:7 171:16	221:10	spreadsheets 83:15
174:24	skilled 179:24 181:16	Spring 18:15 19:14
shown 238:13	184:8	20:4,8,11 23:25
shows 65:2 159:2	slow 127:21 189:24	24:2,11 25:10,16
185:12	Smith 137:11,12	28:10,16 29:10
sick 186:21	178:8,9,11,16	48:14,16,22,25 49:6
side 60:3 174:25	so-called 78:16	102:24 230:9
175:10 199:4	144:10 151:13	Spring's 48:18
sides 73:18 113:15	social 31:4 33:23	Springs 21:23 22:2,21
135:11,12	35:9 37:17	36:3 46:6 48:5,12
sign 29:11 65:12,14	sole 231:4	49:20,23 50:17,21
71:4 173:5 175:25	solid 73:3	101:16 102:2 104:19
176:11,19,25 177:5,	sophisticated 187:18	Springs' 50:2
21 178:5,6 226:11	188:5 194:21 195:19	Stacy 163:11,12
236:5,6	sort 267:15	stage 178:8
Signal 64:22 65:8	sorts 241:23	stair 188:19
151:21 152:15 174:9,	sound 10:25 216:10	stake 206:25
25	253:2	stand 200:5
signature 23:19 60:2	sounds 148:21 156:15	standard 42:5 55:20
signed 10:21,22,24	187:25 191:16 242:5	250:24 251:6
12:5 26:3 30:12	267:19	standing 146:21
40:17 43:2,8,21 50:7	source 50:3	start 49:9 72:21 82:3
64:16,25 67:3 69:16	sources 50:22	90:18,20 139:6 141:3
73:8,18 82:13 85:20	space 251:15	143:17 147:11 186:18
99:13 108:23 113:22	speak 94:2 95:11	242:5 253:21 265:20
143:17 147:10 174:18	96:10 261:7,11,18	started 71:5 89:9
175:14 205:14,16,17	speaking 13:20 52:19	119:19 152:13
206:5,15,20 215:16	235:14 253:20	state 4:3,7,16
226:20 245:10,13		

<p>stated 16:9 177:19</p> <p>statement 13:21 112:16 142:6 161:15 188:19 192:8 195:18, 23 198:14,16,17 228:10 233:16 267:4 273:15</p> <p>States 27:25</p> <p>station 151:16 152:17,25 153:9 217:20</p> <p>stay 65:4 123:19 199:25 200:18 234:7</p> <p>steal 33:2</p> <p>stealing 83:7</p> <p>step 24:24</p> <p>stop 94:19,20 138:2 150:6 186:19 253:23</p> <p>stopper 129:8,9,10</p> <p>stories 182:15</p> <p>straightforward 266:16</p> <p>strategic 4:20 8:5 12:6 31:24 32:3,8 40:17,21,25 52:3,8 54:3,6,10,14 55:10, 13 57:17 59:8 60:13 66:2 69:3 77:25 115:21 117:4,9,19,24 120:6 125:4 133:5,18 141:9 142:3 143:3 144:2,15 149:2,6 157:9,10,20 159:3, 14,19 161:4 168:4,11 170:2,14,20,21 171:13 173:14 179:14,20,23 180:15, 16 181:9 182:24 185:14,18 194:10 197:16,23 198:9,14 200:2,23 201:15 203:14 204:8,25 205:13 206:9 207:13, 15,25 209:3,8 210:2, 24 215:17,19 217:23 218:9,14 220:12 238:17 239:13 253:12 270:4 274:3</p> <p>strategy 30:6 75:5</p> <p>street 4:11 37:16 39:7 124:6</p>	<p>stressed 57:24 70:9</p> <p>stuff 73:14 122:8</p> <p>subject 231:18</p> <p>submitting 271:4,18, 22</p> <p>Subscribed 277:20</p> <p>subsequent 154:10</p> <p>substance 80:17 81:10 96:8 145:12</p> <p>substantial 168:5</p> <p>sued 156:20</p> <p>suffered 168:5 268:15,20</p> <p>suggest 63:22 80:3</p> <p>summarize 76:8</p> <p>Sunday 176:6,18 234:8</p> <p>super 134:13</p> <p>supplied 83:14</p> <p>support 45:8</p> <p>supporting 45:13,18</p> <p>supposed 20:18 41:3 79:6 128:15 175:25 176:19 204:20 226:2, 9</p> <p>surprise 171:24</p> <p>surprised 130:11 132:13 172:3</p> <p>suspected 32:25</p> <p>SVUS 103:19 212:10 213:4</p> <p>sweating 146:14 249:9</p> <p>Swiss 78:10</p> <p>switches 241:20</p> <p>Switzerland 78:10</p> <p>sworn 4:3 277:20</p> <p>system 82:11,15,18 190:19,25 245:19</p>	<p>talking 78:14 79:21, 23,25 82:16 86:17 88:13 103:2 110:14 117:17 131:11 133:9 162:14 178:14 186:15 203:24 208:20 228:10,21 255:19 270:24 272:19 274:24</p> <p>talks 33:23</p> <p>tank 54:11 228:11</p> <p>Target 32:7</p> <p>targets 38:18 254:19</p> <p>team 54:12,16 55:18 59:3 74:9 75:3,4,14 76:11 80:21 82:17 147:16 179:24 181:16,23 182:4 183:4 184:8,18 187:15,16 235:18,25 245:8 246:11 248:11, 13 250:23 251:14 252:21 255:10,23,25 258:9,18</p> <p>teams 59:8 241:24 257:16</p> <p>tech 154:22</p> <p>technical 174:21 253:2</p> <p>technology 82:11</p> <p>telegraphic 160:4,17</p> <p>telephone 72:12 94:9</p> <p>telling 249:11</p> <p>tells 13:12</p> <p>ten 105:25 139:7 140:14 146:5 149:21 150:21,24 241:12 245:15</p> <p>tenure 52:20</p> <p>term 32:2 47:15 54:13 57:9,15 84:6,13 148:13 174:11 184:2, 9 210:19 231:13 246:13 275:19</p> <p>terminate 141:7,8 204:18</p> <p>terminated 47:16 157:21 200:25</p> <p>terminating 142:11</p> <p>termination 141:12 148:4 155:20 166:23 204:13 209:5</p>
T		
<p>table 137:23</p> <p>taking 69:3</p> <p>talk 24:25 64:19 78:24 85:14 108:8 150:7 156:19 182:23 186:19 193:25 213:16 215:15 227:8 246:21 256:7,18 275:24</p> <p>talked 112:6 121:22 175:11 274:19 277:3</p>		

terms 47:11 53:11 65:4 76:19 78:24	thumb 80:9	told 9:10,13,16 11:9 17:7 29:20,25 44:4 53:22 54:10 55:23 60:13 64:7 67:10 68:9 69:2 70:23 72:6 79:9,11 83:5 85:4 93:24 95:15 96:4 97:11 99:25 100:3,5, 21,25 107:9,21 108:7,17,22,24 118:16 119:7,10 127:5,8 128:9,21,22 132:7 147:6,8 152:16 163:25 164:6 165:17 169:16 175:6,7 176:24 178:2 181:11 183:14 188:18 198:9 221:7 223:24 224:5 226:15 227:6 234:2 237:4 258:13 261:10 267:7
TESKE 13:24 35:12,17 36:21 63:19 101:6 105:22 106:3 109:11 110:17 111:2 112:23 126:19 129:13 133:8 142:7 154:24 155:5 158:3 164:9 194:7,14 213:18,24 215:25 223:13,20 232:15 242:20,24 244:14 246:14,24 248:22 251:2,9,21 256:23 257:10,19 258:3 261:22 262:7 264:8, 23 267:17 269:8 271:6,12 276:19,24 277:10	tickets 271:2,3	top 104:7 109:16 218:12 221:13 225:12,23 231:3 236:15
testified 4:5 259:14 268:17	tie 270:23	topic 150:22
testify 8:20 16:5 207:23	time 5:18 6:10,19 7:10,16,20 11:19 14:24 15:8,14,19 22:10 23:5 26:6 28:19,20 42:20 51:8 65:17 68:20 69:15 79:8 84:7,9 88:10 92:25 99:4 103:10 104:2 106:13 114:21 115:11 119:21 124:10 129:3 130:19 132:24 135:18 137:21 138:17 147:11 150:10 151:10,11 154:2,3 158:6 159:22 160:2 161:23 164:16,21 167:3 174:20 177:2 178:22 180:23,24 181:3,5,6 195:5 202:23 203:6 212:18 216:23 219:8 222:19 224:21 230:12 233:17 234:12,20 237:5 240:3 244:4 249:17, 19 251:19 253:13 254:7 263:3 264:25 266:11 272:24 273:18	topics 6:21 8:12,16, 19 16:4,6,9
testifying 130:21 261:25	timeframe 114:20 180:3	total 58:17
text 64:8 90:14 103:12,19 152:14,15, 16 172:6 174:8,9,17 195:11 206:2 220:19, 21 221:7 224:23 225:5,16 230:14 234:14,22 240:5,11 242:12 244:6 252:9 254:9,16 263:5,11,19 265:12 273:2,15 274:7 275:25 276:2	timeline 73:11,16 147:9 265:11 267:20	totally 56:7 102:9 134:18 218:20 221:10 241:9,11
texted 64:20,23	times 37:15 39:6 55:16 72:18 84:13 101:14 140:3,8 148:14 181:2 185:24 186:16 187:6 209:14 210:2 237:14 245:14 256:12 265:24	touch 236:13
thing 5:15,25 87:2 114:13 173:13 187:24 193:17	timing 207:10	track 21:15 151:17 152:17 217:20
things 62:17 88:24 89:14 93:13 152:22 167:24 246:22 256:16	tired 187:2	tracking 31:4 187:18 188:6 222:2
thinking 156:18	title 23:25 97:4	train 234:3 237:6 271:2
thought 84:25 117:17, 23 120:6 130:8 132:15 172:18 232:18	today 8:21 15:7 92:4 95:21 112:14 114:12 130:22 133:22 147:25 169:21 170:10 268:13 269:13 270:11	transaction 159:2
thoughts 170:6	today's 91:7,13,16 92:20 96:2 261:8 266:25	transcript 277:9
three-month 205:7		transfer 64:7 66:7 116:14 159:13 160:4, 18
three-page 135:20 136:2		transferred 255:25
		translated 61:4 70:25
		translation 61:2 105:9
		transported 79:10
		Travel 270:19
		traveled 270:25

triggers 241:23
trip 126:8 128:8
 241:25
trips 122:25
trouble 237:20
true 85:10 87:3 100:8
 139:13,14 195:18,21,
 22 196:7,10 197:5,7,
 11,20 198:3 273:20,
 21
trust 62:4
truth 87:3 267:10
truthful 5:12
Tuesday 94:14,25
 112:19
turn 8:11 23:16 26:20
 109:14 114:4
two-page 263:11
type 18:11 256:8
 271:5

U

U-A-N-G 26:17
U.S. 4:21 57:6,8
 148:23 172:2 199:11
Uh-huh 153:5
ultimately 62:9 63:2
 65:15 177:21
unable 267:14
unaffiliated 48:6
uncomfortable 189:23
understand 5:16,18
 12:17 18:5 19:17
 21:20 22:25 31:7
 32:5,19 34:9 39:13
 48:8 49:12 72:11
 79:3 83:21 87:18,23
 88:13 89:21 132:14
 140:20 154:4 180:10
 198:17,24 201:8,9
 207:3,20 242:12,14
 245:20 246:2 247:8
 249:12 252:12 254:19
 256:2
understanding 6:4
 34:4,11,12,21 42:24
 44:19 54:5,8 55:3,21
 57:15 58:20 60:11,20
 64:17 70:11 72:19,
 20,24 73:10 74:7,22

75:23,24 76:16,18,19
 77:6 81:7,16 83:2
 84:3,15,17 94:17
 96:25 105:5,7,12
 106:18,20 109:19,21
 112:21 113:6,12
 114:10 119:12,17
 127:16 130:12 131:13
 132:3,5 134:24 135:3
 140:25 142:14
 144:18,22,25 168:8
 169:13 184:17 188:15
 189:17 199:16,23
 201:7 205:15 208:14
 229:10 244:24 245:2,
 16 255:21 256:2
 258:13,17 275:5,12,
 18,20 276:9,10

understands 266:17

understood 17:2

247:23 249:21

unexpected 174:19

Union 152:17,25

United 27:25

units 58:21

unofficial 101:23

unquote 86:19 88:3

unreasonable 114:13

unrelated 204:19

209:6

urgently 38:2

USB 80:9,12 236:4,6,
 8,9 238:8

V

valuable 73:4,15
 74:14,16,17 75:11
 76:10 78:23 80:20,24
 81:3,9 84:14,17,25
 85:16 86:19,25 87:2,
 7 88:3,15,16,17 89:5
 146:24 148:2

vendor 14:18,20

verification 23:17

verified 19:15 21:4

97:19 100:4

verify 22:21 24:4

100:16 182:15 195:8

version 65:14,16

66:6,7,8,9 69:11,14

70:24 137:17 177:7,
 12,22 227:18,19
versus 188:9 191:25
vetted 120:5
vice 39:9
video 83:23
view 32:16 56:6 57:14
 128:25 201:11
viewed 132:15
virgin 145:14,16
Virginia 12:23 13:20
 69:8,21 175:23
 226:16 271:2
Vision 4:21 12:6
 31:24 32:3,8 40:17,
 21,25 52:3,8 54:3,7,
 10,14 55:10,13 57:17
 59:8 60:13 66:2 69:3
 77:25 115:21 117:4,
 10,19,25 120:6 125:5
 133:5,18 141:9 142:4
 143:3 144:2,15
 149:2,7 157:10,20
 159:3,14,20 161:4
 170:2,14,20,22
 171:14 173:14
 179:14,20,24 180:15,
 16 181:9 182:24
 185:14,18 194:10
 197:16,23 198:9,14
 200:2,23 201:15
 203:14 204:8,25
 206:9 207:13,15,25
 209:3,8 210:2,24
 215:17,19 217:23
 218:9,14 220:12
 238:17 239:13 253:12
 270:4 274:3

Vision's 8:5 168:4
 205:13

visit 123:8,10 128:15
 233:23

visited 137:21

voice 189:8,12,18

voluntarily 186:15

W

W-A-I 163:11

W-A-N 9:23

Wai 163:11,12

January 31, 2019

28

wait 211:24 212:11 267:20	226:17 227:7,8,17 228:2 236:23 237:19 241:3 242:10 243:5 245:6 248:12 251:11 265:14	155:1,15 156:1 157:1 158:1,8 159:1 160:1, 6 161:1,25 162:1 163:1 164:1,23 165:1 166:1 167:1,5 168:1 169:1 170:1 171:1 172:1 173:1 174:1 175:1 176:1 177:1 178:1 179:1 180:1 181:1 182:1 183:1 184:1 185:1 186:1 187:1 188:1 189:1 190:1 191:1 192:1 193:1 194:1 195:1 196:1 197:1 198:1 199:1 200:1 201:1 202:1 203:1 204:1 205:1 206:1 207:1 208:1 209:1 210:1 211:1 212:1,7,20 213:1 214:1 215:1 216:1,25 217:1 218:1 219:1,10 220:1 221:1 222:1 223:1 224:1,23 225:1,2 226:1 227:1 228:1 229:1 230:1,14 231:1 232:1 233:1 234:1,22 235:1 236:1 237:1 238:1 239:1 240:1,5 241:1 242:1 243:1 244:1,6 245:1 246:1 247:1 248:1 249:1 250:1 251:1 252:1 253:1 254:1,9 255:1 256:1 257:1 258:1 259:1 260:1 261:1 262:1 263:1,5 264:1 265:1 266:1 267:1 268:1 269:1 270:1 271:1 272:1 273:1,2 274:1 275:1 276:1 277:1,18
waiting 153:8 154:14, 16 222:24 243:19 250:4	Wallop's 59:21 69:8, 21 184:3 233:10,16, 22 237:13	wanted 115:12,20,22 135:13 157:9 183:5 192:25 193:5 208:2 227:5 268:6
walk 124:6	Wan 9:21	wanting 110:25
walking 132:23	Wang 4:9,17,18 5:1 6:1 7:1,9,22,25 8:1 9:1 10:1 11:1,21 12:1 13:1 14:1 15:1 16:1 17:1 18:1,14 19:1 20:1 21:1 22:1 23:1,8,21 24:1 25:1, 24 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1,10 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1,18 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1,12 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1,20,23 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1 145:1 146:1 147:1 148:1 149:1 150:1 151:1 152:1 153:1 154:1	Washington 37:15 39:6 104:11 106:24 107:5 118:10,13 123:2 176:17 226:16 227:11
wall 37:16 39:7 82:19 187:24 188:14 190:14,17 191:8,9, 14,21 193:5,9,17,22		watch 187:24
Waller 86:21 87:8 88:2 103:3 117:10, 19,24 120:7 148:17 151:4 153:21 171:6 179:22 180:18 183:3 188:25 197:17 215:7 216:13 222:4 232:24 233:11 244:19 245:6 250:18 254:2,17 263:22 264:17 275:10,23		
Waller's 184:4 255:23 273:15		
Wallop 54:10,15 55:10,16 57:17,23 58:25 60:13 62:3 64:8,20,21 65:25 66:9 67:2,10,17 68:3,16,24 69:6,19, 23 70:9 77:25 78:9 79:10 80:3 82:7,10, 16,22 83:6 85:14,16 86:21 87:7,25 88:15 89:4,11 90:8 103:3 105:8 110:4 114:8 117:10,19,24 118:8, 20,21 119:7,18 120:7,12,15,19 123:8,13,17 126:12 129:19 130:8 131:17 134:12 137:22 138:20 139:19,21 140:3 145:13 146:15 147:2 148:17 151:4,25 152:15 153:21 165:18 166:3 171:6 173:14 174:8 176:4 177:13 178:15 179:21 180:17 182:12 183:4 186:14 188:25 190:16 196:2, 18 197:17,18 215:7 216:13 222:4 225:14		

waterline 54:3,6,9,
11,14,22,23 55:5,9,
17,24 56:3 58:5,13,
25 59:5 60:5 61:11
66:16,24 67:16,21
68:5,10 69:2,9 70:13
115:17,22 176:9
226:24 228:11 229:3
241:9
waterlined 59:3
week 67:4
weekly 71:9 73:19
143:10,18 145:2
223:15 245:9
weeks 139:23 274:4
weird 132:6,12,21
173:13
whatsoever 171:21
259:8 262:11
whistle 34:16 35:4
39:8 222:14 267:8
white 73:3
Wikipedia 73:13
William 157:14,17
wire 43:9 63:23 64:7
66:6,12 67:11,18
108:6 116:14 159:13,
16,19 160:25 161:5,
10,14 172:24 174:7
wired 40:16,24 57:7
64:24 67:24 205:12,
18
wiring 40:20 170:21
woman 127:9
wondering 97:20
172:21 184:8
word 72:17,19 83:22
85:25 111:20 130:23
146:6 172:14 184:3
275:2
words 12:20 44:20
59:6 65:11 93:3,14
111:14,19 180:19
181:20,22 185:2
200:11 204:17 210:7
211:5 248:2 250:8,
10,11,15,20 276:8
work 18:24 21:25
22:19 29:8 35:22
48:5,6,12 49:21
50:9,25 59:9 62:17
75:14,16 76:22,23

77:2,3,8 101:25
104:13,14,17,18
118:18 127:17 134:21
142:12 154:23 157:4,
19 182:23 186:11
207:16 209:8 211:6
222:14 229:16 230:2
242:6 275:11,15
worked 75:12 208:2
211:3 257:16 264:16
276:12,16,22
working 20:7 54:12
75:6 147:16 229:23
works 104:16 135:10
256:13
worth 126:14
wrap 150:18
write 80:4
writing 114:14
written 79:13,14,20
80:4 119:7 197:9,14
202:6
wrong 149:19 156:21
220:24 237:21,23
249:16 256:20 264:17
wrongly 249:21
wrote 109:24

Y

Y-I 162:25
Y-U 157:14
yard 127:2
year 58:22,23 76:15
93:11,15,18,20
124:10,17,21 142:23
176:2,7 222:21,22,24
223:8 227:21
Year's 177:16
years 37:6 38:5
105:25 106:2 155:2
Yi 162:25
York 4:4,12 18:15
21:23 22:7,8 23:25
27:23 37:15 39:6
48:15 82:13 90:6,9,
15 91:3 101:15 102:2
104:18 106:12
109:17,19 125:17
132:23,24 139:20
166:8 226:14 230:9

232:17,19 234:3
236:21 237:7
Yu 157:14,17
Yvette 4:9,17 5:1 6:1
7:1 8:1 9:1 10:1
11:1 12:1 13:1 14:1
15:1 16:1 17:1 18:1
19:1 20:1 21:1 22:1
23:1,21 24:1 25:1
26:1 27:1 28:1 29:1
30:1 31:1 32:1 33:1
34:1 35:1 36:1 37:1
38:1 39:1 40:1 41:1
42:1 43:1 44:1 45:1
46:1 47:1 48:1 49:1
50:1 51:1 52:1 53:1
54:1 55:1 56:1 57:1
58:1 59:1 60:1 61:1
62:1 63:1 64:1 65:1
66:1 67:1 68:1 69:1
70:1 71:1 72:1 73:1
74:1 75:1 76:1 77:1
78:1,2 79:1 80:1
81:1 82:1 83:1 84:1
85:1 86:1 87:1 88:1
89:1 90:1 91:1 92:1
93:1 94:1 95:1 96:1
97:1 98:1 99:1 100:1
101:1 102:1 103:1
104:1 105:1 106:1
107:1 108:1 109:1
110:1 111:1 112:1
113:1 114:1 115:1
116:1 117:1 118:1
119:1 120:1 121:1
122:1 123:1 124:1
125:1 126:1 127:1
128:1 129:1 130:1
131:1 132:1 133:1
134:1 135:1 136:1
137:1 138:1 139:1
140:1 141:1 142:1
143:1 144:1 145:1
146:1 147:1 148:1
149:1 150:1 151:1
152:1 153:1 154:1
155:1 156:1 157:1
158:1 159:1 160:1
161:1 162:1 163:1
164:1 165:1 166:1
167:1 168:1 169:1
170:1 171:1 172:1
173:1 174:1 175:1
176:1 177:1 178:1

179:1 180:1 181:1
182:1 183:1 184:1
185:1 186:1 187:1
188:1 189:1 190:1
191:1 192:1 193:1
194:1 195:1 196:1
197:1 198:1 199:1
200:1 201:1 202:1
203:1 204:1 205:1
206:1 207:1 208:1
209:1 210:1 211:1
212:1 213:1 214:1
215:1 216:1 217:1
218:1 219:1 220:1
221:1 222:1 223:1
224:1 225:1 226:1
227:1 228:1 229:1
230:1 231:1 232:1
233:1 234:1 235:1
236:1 237:1 238:1
239:1 240:1 241:1
242:1 243:1 244:1
245:1 246:1 247:1
248:1 249:1 250:1
251:1 252:1 253:1
254:1 255:1 256:1
257:1 258:1 259:1
260:1 261:1 262:1
263:1 264:1 265:1
266:1 267:1 268:1
269:1 270:1 271:1
272:1 273:1 274:1
275:1 276:1 277:1,18

Z

Zachary 95:25
zeros 158:17